

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:	
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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.	
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	
c. Updated Housing and Employment Topic Paper.	
d. Updated Green Belt Topic Paper.	

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

Paragraph(s):

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 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.



Planning Policy
Shropshire Council
The Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Our Ref: 62262071

11 June 2024

Dear Sir/Madam,

Representations on behalf of the Raby Estate regarding Additional Local Plan Material

On behalf of the Raby Estate (ref: A0149), we submit representations in relation to the additional material for the Shropshire Local Plan examination.

The Raby Estate have significant concerns regarding the soundness of the Shropshire Local Plan Review. The additional material that has been produced by Shropshire Council does not address the Inspectors' concerns, and raises further issues regarding the soundness of the draft Local Plan and the evidence base it is informed by.

We have responded to the following from GC44 (Updated Additional Sustainability Appraisal):

- Paragraphs 6.6, 6.8, 6.16, 6.17, 6.18, 6.19, 6.20, 6.21, 6.28, 6.30, 6.35, 6.38, 6.40, 8.3, 8.6, 8.7, 8.8, 8.7, 8.73, 8.78, 8.90, 8.93, 10.3, 10.4, 10.6, 10.14, 10.15, 10.35, 10.36, 10.37, 10.38, 10.51, 10.57, 10.60, 10.61, 10.63, 12.11, 12.14, 12.16, 12.17, 12.19, 12.20, 12.21, 12.23, 12.26, 12.27, 12.30, 12.31, 12.34, 12.46, 12.51, 12.52, 12.53, 12.58, 12.62, 12.63, 12.64, 12.68, 12.83, 12.84, 12.87, 12.96, 12.100, 12.101, 12.102, 13.11, 13.45 and 13.54;
- Tables 6.2, 6.3, 8.7, 10.1, 10.3, 10.5, 12.1, 12.3, 12.4, 12.6, 13.4;
- Figures 12.1, 12.2, 12.3, 12.4; and
- Appendices 1 and 10.

We have responded to the following from GC45 (Housing and Employment Topic Paper):

- Paragraphs 6.2, 6.3, 6.6, 7.5, 7.6, 7.10, 7.13, 7.17, 7.19, 7.24, 7.26, 7.32, 7.35, 7.36, 7.43, 7.56, 7.57, 7.59, 7.61, 8.5, 8.12, 8.13, 8.22, 8.26, 8.28, 8.29, 8.33, 8.34, 8.35, 8.37, 8.38, 8.39, 8.53, 8.55, 8.56, 8.61, 8.63, 8.64, 8.66, 8.73, 8.76, 8.81, 8.90, 9.4, 9.5, 9.6, 9.7, 9.8, 9.10, Table 10.1, 10.2, 10.3, 19.16, 19.17, 19.18, 19.19, 19.20, 19.21; and
- Tables 8.1, 8.2, 8.3, 9.1, 10.1, 10.2, 10.3, 19.1.

We have submitted the required part a and b consultation response forms, alongside our representations and the following appendices:

- Indicative Masterplan for Beslow;
- Beslow Highways and Transport Masterplan Strategy;
- Beslow Historic Environment Baseline Assessment and Constraints and Opportunities Report;
- Land at Shore Lane Pre-Application Response from Shropshire Council;
- Cressage Pedestrian Accessibility Review; and
- Cressage Preliminary Site Access.



Please do not hesitate to contact myself (07709 461786 / doug.hann@wsp.com) or my colleague, Zac Wade (07443 097017 / zac.wade@wsp.com) if you have any queries. Please can you confirm receipt.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Doug Hann'. The signature is fluid and cursive, with a large initial 'D' and 'H'.

Doug Hann
Planning Director



Raby Estate

SHROPSHIRE LOCAL PLAN REVIEW

Representations regarding Additional Local Plan
Material





Raby Estate

SHROPSHIRE LOCAL PLAN REVIEW

Representations regarding Additional Local Plan Material

REPRESENTATIONS (VERSION 1) PUBLIC

PROJECT NO. 62262071

DATE: JUNE 2024

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EXECUTIVE SUMMARY

The Raby Estate have significant concerns regarding the soundness of the Shropshire Local Plan Review. The additional material that has been produced by Shropshire Council (at the request of the Inspectors owing to their own concerns regarding soundness) does not address these concerns, and in itself raises further issues regarding the soundness of the draft Local Plan, and the evidence base it is informed by.

At the Inspectors request, the Council have updated the Sustainability Appraisal (GC44) that informs the draft Local Plan, and produced a Housing and Employment Topic Paper (GC45) to consider these matters further. Within these documents Council have assessed:

- Shropshire's total housing requirement;
- Whether it is reasonable to take 1,500 dwellings from the Black Country's unmet need;
- Whether there needs to be an uplift of 500 dwellings to Shropshire's housing need.

In short, the Council determined that the evidence suggested:

- The Council's 'High Growth' option was the most sustainable way to meet Shropshire's growth requirements;
- It is reasonable to accommodate 1,500 dwellings within Shropshire's housing requirement; and
- An addition uplift of 500 dwellings would be accommodated through new windfall sites.

The additional information that Shropshire Council have submitted in support of the draft Local Plan will not make the plan sound. Both the evidence base, and therefore draft Local Plan, need significant modifications to ensure that it can be found sound.

The additional material prepared by the Council is flawed and doesn't take account of reasonable evidence. If the draft Local Plan is therefore based on this evidence, it isn't justified, and must be found unsound (in the context of Paragraph 35 of the NPPF).

This approach, particularly in the context of the Black Country's growing unmet need, renders the draft Plan an ineffective one that has not been positively prepared, as the cross boundary matters (such as unmet need) have been deferred and based on out-dated agreements. This further demonstrates the inconsistency with Paragraph 35, and therefore unsound nature of the plan (and its evidence base).

Having regard of the above, to make the draft Plan sound we recommend the following:

- Undertake a wider assessment and test higher growth scenarios.
- In the context of the Black Country's rising unmet need, test whether Shropshire Council could meet more of the unmet need, and explore whether an updated SoCG is required.
- Update the Sustainability Appraisal to assess Cressage and Beslow, factoring in updates to the schemes.
- Reconsider the use of windfalls to meet the additional growth needs in Shropshire on the basis that neither the evidence base nor spatial strategy support this approach.
- Re-assess all strategic sites and consider where they could contribute towards specifically meeting the Black Country's unmet need.
- Allocate the Raby Estate's site at Beslow (BWU001) as a strategic site to meet project housing need.



- Remove CES005 as a proposed allocation, replacing it with Land at Shore Lane (CES002).

While they will not solve all the issues with the plan, the Raby Estate has two sites available for development (subject to approval through the planning process) that will assist the Council in addressing the above concerns. Their sites, the strategic site at Beslow, and the Land at Shore Lane, Cressage have not been reassessed in the Sustainability Appraisal. Further, the schemes have been updated, as detailed in these representations, which should be accounted for. The document should be updated to consider this, and recognise the contribution they can make to meeting both Shropshire, and the Black Country's growth.

1 INTRODUCTION

- 1.1.1. The Raby Estate is promoting two sites for development in the draft Local Plan: the proposed new settlement of Beslow New Town (site ref: BWU001) and Land at Shore Lane, in the village of Cressage (site ref: CES002). These sites are available for development immediately (subject to securing planning permission) and (if progressed) will make a significant contribution to both Shropshire and the Black Country's housing need.
- 1.1.2. The Estate is concerned that Shropshire Council are not meeting their requirement under paragraph 32 of the National Planning Policy Framework (NPPF) (2023) to prepare a Local Plan in accordance with legal and procedural requirements, and to be sound.
- 1.1.3. Per the NPPF, plans are 'sound' if they are positively prepared, justified, effective; and consistent with national policy. The proposed Local Plan strategy is not positively prepared or justified.
- 1.1.4. This is due to a failure to comprehensively review and update the Sustainability Appraisal (SA) Site Assessments (ref: GC44), and subsequent failure to use current data to make justified conclusions on draft site allocations in the Sustainability Appraisal (GC44) and Housing and Employment Topic Paper (HETP) (ref: GC45). In doing this, Shropshire has not planned a positive approach to accommodate the proposed contribution of 1,500 dwellings and 30ha of employment land towards the Black Country's unmet need. These representations will outline the Raby Estate's position on these matters.
- 1.1.5. The Raby Estate's site at Beslow (ref: BWU001) lies in the Shrewsbury to Telford strategic growth corridor and the West Midlands strategic growth corridor, an area identified for economic investment. The site is strategically located on the M54/A5 corridor to the Black Country, wholly outside of the Green Belt. This means Beslow is extremely well-placed to deliver new homes, employment and community uses which can meet Shropshire's (and the Black Country's) economic and social needs and be of significance for the wider Midlands region.
- 1.1.6. Owing to the above, Beslow deserves more thorough consideration than was given in the SA's (GC44) site assessment process, which does not get to the heart of the site's opportunities.
- 1.1.7. These representations first focus on our concerns with the wider strategy and conclusions of the above documents. We then look specifically at how Beslow is viewed within the SA and HETP, arguing that it is a viable and deliverable site for the housing requirements of Shropshire and the Black Country.
- 1.1.8. These representations should be read in conjunction with the previous Regulation 19 representations and Hearing Statements made by the Raby Estate.
- 1.1.9. The representations are structured as follows:
- Provides comment on the additional material Shropshire Council have submitted regarding housing requirement;
 - Provides comment relating to the promotion of Beslow New Town; and
 - Provides comment relating to the proposed allocations in Cressage.
- 1.1.10. The following documents are provided in the Appendices of this document to provide further context:
- Appendix A – Indicative Masterplan for Beslow;
 - Appendix B – Beslow Highways and Transport Masterplan Strategy;



- Appendix C – Beslow Historic Environment Baseline Assessment And Constraints And Opportunities Report
- Appendix D – Land at Shore Lane Pre-Application Response from Shropshire Council;
- Appendix E – Cressage Pedestrian Accessibility Review; and
- Appendix F – Indicative Layout of Land at Shore Lane, Cressage.

2 LOCAL PLAN STRATEGY

- 2.1.1. This section outlines the Raby's Estate's position on the Sustainability Appraisal (GC44), Housing and Employment Topic Paper (GC45) and Green Belt Topic Paper (GC46). As there is a significant amount of crossover between the documents, our comments are presented thematically.
- 2.1.2. We have reviewed each of the options outlined by the Council in GC44 and GC45, and have commented below. This is structured as follows:
- Reasonable options for contributing to the unmet housing needs forecast to arise in the Black Country.
 - This option assesses whether Shropshire Council should take 1,500 dwellings to meet the Black Country's unmet need.
 - We question why the Council have not assessed options for alternatives, including a higher provision in the context of the unmet need no longer being by neighbouring (constrained) authorities.
 - Reasonable options for the housing requirement.
 - This option assesses whether the 30,800 dwelling housing requirement is a reasonable option based on the evidence base.
 - We question whether this is truly a 'High Growth' option based on the available evidence, and question whether this reflects a proactive plan making process.
 - Reasonable options for accommodating the uplift to the proposed housing requirement.
 - This option assesses whether it is reasonable to uplift the housing requirement by 500-dwellings.
 - We question whether this figure should be higher, particularly in the context of the 1,500 Black Country dwellings being retrofitted into the Council's housing requirement. We suggest that as a minimum this figure is raised from 500 dwellings to 1,500 dwellings to account for this.
 - We also question why all of these dwellings will be provided by windfall sites. The spatial strategy does not support this approach and it is unlikely that these dwellings will therefore come forward.
 - To address this, we suggest allocating additional sites.
 - Sites to accommodate the proposed 1,500 dwellings contribution towards the unmet need forecasts to arise within the Black Country.
 - This outlines the sites proposed to meet the Black County's unmet need.
 - Some of the sites selected are in illogical places (ie the west of Shrewsbury) that are not well-located in relation to the Black Country. We recommended that greater consideration is given to the location site's allocated to meet the Black Country need.

2.2 HOUSING NEED

CONTEXT

- 2.2.1. Shropshire Council, through cooperation with the Association of Black Country Authorities (ABCA) and the Duty to Cooperate, included a contribution of 1,500 dwellings and 30 hectares of

employment land towards meeting the Black Country's unmet needs, out of the 27,000 dwellings that they have identified as being required (per the SoCG).

- 2.2.2. During the preparation of Shropshire's draft local plan, ABCA (comprising Dudley, Walsall, Sandwell and Wolverhampton Councils) were cooperating to prepare a joint Local Plan. The latest draft Black Country Plan (before the members of ABCA decided to prepare individual plans) set out a need to find 28,234 homes and 210 hectares of employment land outside of their administrative area.
- 2.2.3. This shortfall has since grown owing to the changes made to the NPPF in December 2023, resulting in several of the Black Country Local Authorities no longer releasing any (or as much) Green Belt to meet their own needs, as is the case with neighbouring Local Authorities. This will mean that the unmet need will continue to grow.
- 2.2.4. Further, some neighbouring authorities, such as South Staffordshire District Council, in addition to proposing to release less Green Belt have suggested that they will have to make smaller contributions towards ABCA's unmet housing and employment need. This means that the need is growing.
- 2.2.5. As some of the Black Country authorities, and neighbouring authorities are now releasing less Green Belt, there will be a need for Shropshire Council, which is less constrained than these authorities, to do more under the Duty to Cooperate. If Shropshire Council was to take this proactive approach, they could reap the socio-economic benefits associated with providing housing and meeting the Black Country's unmet need.
- 2.2.6. The cooperation between ABCA and Shropshire Council has resulted in a recognition that unmet needs should be accommodated in Shropshire. The draft Local Plan accommodates 1,500 dwellings and 30 hectares of employment need from the Black Country (which is also confirmed in the signed Statement of Common Ground (SoCG) (EV041)). This now forms part of Shropshire Council's recognised housing requirement.
- 2.2.7. While ABCA welcomed the initial 1,500 dwellings and agree that these are required, they also recognised that this should be a starting point for the total contribution (see EV041). The Raby Estate agrees with this position and subsequently proposed an early review mechanism in the Duty to Cooperate Hearing Sessions (ADTC.04 A0149) to account for this. The SA still gives no regard to this option and should therefore be updated to consider this, particularly owing to the time that has now passed since the SoCG was signed, and the length of time the draft Local Plan has been at examination for.
- 2.2.8. As established, a significant amount of time has passed since the SoCG was signed, and since the legal 'Duty to Cooperate' was considered in the draft Local Plan's examination. Since then, there has been material change in circumstances, with other authorities no longer taking as much of the unmet need, the unmet need increasing and ABCA disbanding. This matter should therefore be revisited to ensure that any understandings are based on accurate evidence/need, and the implications for this draft Local Plan can be fully realised.
- 2.2.9. Following the Stage 1 hearings associated with the examination, the Inspectors requested the Council to explicitly and separately assess the impact of a contribution of 1,500 dwellings towards meeting the Black Country's unmet need (see ID36 and ID37).
- 2.2.10. Shropshire Council have subsequently recognised that they will now pursue a 'High Growth' strategy which will result in 29,800 dwellings (including the additional 500 dwellings), plus 1,500 dwellings

identified for the Black Country. While this move is welcomed (and the most sustainable option of those tested), based on the evidence provided in the GC44, it is not clear if this is the most sustainable approach to take, as no higher growth options have been tested.

- 2.2.11. Owing to this, the draft Local Plan cannot be considered sound. Paragraph 35 of the NPPF outlines that in order to be found, plans need to be:
- Positively prepared to meet an area's needs, and meet the unmet need from neighbouring authorities where practical to do so;
 - Justified in that it takes into account reasonable alternatives **and** is based on appropriate evidence;
 - Effective, ensuring the plan is development plans for the needs of the plan period and is based on effective joint working on cross-boundary matters; and
 - Consistent with national policy.
- 2.2.12. Based on how the Council have a) prepared the evidence base (in the form of the SA); and b) applied this evidence base to the draft Plan's proposed strategy, we outline below evidence that demonstrates that the draft Local Plan hasn't been positively prepared and isn't justified. The draft Local Plan will not be sound, or consistent with Paragraph 35 of the NPPF until the SA has been updated to consider all the alternative options.

REASONABLE OPTIONS FOR CONTRIBUTING TO THE UNMET HOUSING NEEDS FORECAST TO ARISE IN THE BLACK COUNTRY

- 2.2.13. This section of the representations explores the matters outlined in Section 6 of the SA (GC44) and Section 6 of the HETP (GC45), focusing on the identification and analysis of reasonable options of contributing towards the Black Country's unmet housing needs.
- 2.2.14. As outlined above, it is well established that 1,500 dwellings provided in Shropshire will be to meet the Black Country's unmet need, and this is secured by a SoCG (EV41).
- 2.2.15. Section 6 of GC44 assesses two options for meeting a contribution towards the Black Country authorities' unmet need:
- No contribution; and
 - Taking 1,500 dwellings.
- 2.2.16. While a contribution of 1,500 dwellings towards the unmet need is the most suitable option, there is no assessment of this being the most suitable scale of contribution (ie more dwellings given the scale of the unmet need); no alternative scenarios are tested and therefore an informed, evidence based and justified decision cannot be made by the Council.
- 2.2.17. While the SoCG (EV041) accepted the 1,500-dwelling contribution, it is recognised that as part of the Shropshire Local Plan Examination there may be a requirement to further consider the issue of cross-boundary support from Shropshire (see paragraph 8.13 of EV041).
- 2.2.18. The cooperation with ABCA did not resolve how Shropshire should respond to the unmet needs of the Black Country as new evidence of the needs emerges through the preparation of each Black Country authority's Local Plan. An early review of the plan was rejected by Shropshire Council (see GC24); however, we have previously demonstrated how this could work in practice and demonstrated that this has been a sound approach elsewhere (see Appendices of ADTC.04 A0149).

To be found to be justified (and therefore sound) this option needs to be assessed before it can be dismissed.

- 2.2.19. Throughout the assessment in GC44 and GC45 of the two options it is recognised that the provision of this unmet need will be beneficial to the Black Country (or wider area) **and** Shropshire (in terms of contributing to housing growth for all sections of society, building a strong and sustainable economy and adapting to climate change).
- 2.2.20. If the benefits of only providing 1,500 dwellings towards the Black Country's unmet need are recognised (and outweigh the benefits of contributing nothing), then the SA should assess options for further housing to understand what the most sustainable/highest ranking option is.
- 2.2.21. Table 6.3 of GC44 only assesses no contribution or a 1,500 dwelling contribution and does not assess nor justify why the proposed contribution is 1,500 dwellings. To justify this contribution, alternative scenarios should be tested to find an optimum scale of contribution alongside Shropshire's own housing requirement.
- 2.2.22. It is recognised that the contribution is now proposed to be achieved through a specific uplift and is assessed in a separate exercise to Shropshire's housing growth strategies (Table 8.7), contrasting with GC29, however, the same method of comparing scales of housing contribution has not been adapted to this section of the Local Plan strategy. Therefore, while it is justified that a contribution towards the Black Country's unmet housing need is a more suitable solution than no contribution, and is unlikely to have a strong negative effect, this should be assessed against meeting a higher amount of unmet need.
- 2.2.23. On this basis as the SA remains unjustified, Shropshire Council should once again revise the document to test **all** reasonable alternatives. Until this is done, the SA (and therefore draft Plan) cannot be found sound, as it is not justified, per Paragraph 35 of the NPPF.

REASONABLE OPTIONS FOR THE HOUSING REQUIREMENT

- 2.2.24. This section reviews and comments on Section 8 of the SA (GC44) and Section 7 of the HETP (GC45), which focus on the potential growth strategies for Shropshire's housing requirement.
- 2.2.25. In determining Shropshire's own housing requirement, 'Moderate', 'Significant' and 'High' growth options are assessed. Previously (in GC28), Shropshire have advised that they would pursue a 'High Growth' strategy, however, this was based on a revised local housing need (LHN) figure.
- 2.2.26. The revised (reduced) housing need impacted the growth options assessed in the additional SA; the new 'High Growth' option was more similar to the 'Moderate Growth' option from the original SA. The Inspectors noted (see ID36) that the local housing need should not be reviewed, and a revised SA was required to assess the growth options using the previously agreed LHN.
- 2.2.27. The growth options were assessed, and Paragraph 8.73 of GC44 concludes that none of the reasonable housing requirement options are likely to result in a strongly negative effect on Shropshire and, as such, no mitigation measures would be required for any options.
- 2.2.28. As such, Shropshire selected Option 3b, which is the High Growth option, plus 1,500 dwellings (which totals 31,300 dwellings). This was selected as it was the most sustainable of the reasonable options for the level of housing growth required and would achieve the most appropriate balance across all three pillars of sustainability – social, economic, and environmental.

- 2.2.29. This option represents an increase of 500 dwellings on top of the previous 'High Growth' strategy, which is a positive move, and recognises that a more sustainable option (above what was previously a proposed approach and considered the most sustainable option) can deliver more housing.
- 2.2.30. Out of all the options considered this is the most ambitious (and the increase in dwelling numbers is supported). While, of the options presented, it most closely reflects a need to positively prepare the Local Plan, it is not clear why no higher option than this is also assessed, to determine whether it would be less sustainable than the 'High Growth'/Option 3b.
- 2.2.31. An even higher growth option could allow for increased flexibility to respond to changes in the local housing need over the plan period and result in more benefits for Shropshire (and the wider area), as the provision of housing in itself has significant socio-economic and environmental benefits when pursued in a sustainable way. As a minimum, assessing higher options would demonstrate that the plan has been positively prepared, which to date it has not been. Until this assessment has been undertaken, the draft Plan will not meet the 'justified' test of soundness and would be inconsistent with the NPPF.

REASONABLE OPTIONS FOR ACCOMMODATING THE UPLIFT TO THE PROPOSED HOUSING REQUIREMENT

- 2.2.32. This section comments on Section 10 of the SA (GC44) and Section 8 of the Housing and Employment Topic Paper (GC45), which consider options to accommodate an uplift in Shropshire's housing requirement by 500 dwellings.
- 2.2.33. As outlined above, by selecting to proceed with Option 3b/High Growth (including 1,500 dwellings for the Black Country unmet need) Shropshire Council have amended their proposed strategy to provide a further 500 dwellings. They propose to find these dwellings through altering settlement guidelines and increasing windfall allowances (Option 1). This does not reflect a plan that has been positively prepared, nor is it justified or effective. Therefore, it is inconsistent with national policy (NPPF Paragraph 35).
- 2.2.34. The SA outlines four options to accommodate this increase in dwelling numbers and assesses each of these in turn:
- Option 1 – Increasing settlement guidelines and windfall allowances;
 - Option 2 – Densification of proposed site allocations;
 - Option 3 – Increasing site allocations; and
 - Option 4 – A combination of two or more of the other options.
- 2.2.35. The Council's decision to progress with Option 1 is based on the following justification:
- They state this option achieves the most appropriate 'balance' across all three pillars of sustainability – social, economic and environmental; and
 - They state this option would ensure that the proposed uplift to the proposed housing requirement is accommodated within the most sustainable settlements with the widest array of infrastructure, services and facilities necessary to support new development.
- 2.2.36. This is despite paragraph 8.20 of GC45 detailing that options that provide greater certainty about the proportion of uplift to the housing requirement direct to urban areas achieve more positive impacts on social, economic, and environmental factors.

- 2.2.37. As it is completely unclear where windfall dwellings will arise, there is little certainty to the delivery of these dwellings, as conceded in the comments made in paragraph 8.20 of GC45.
- 2.2.38. The NPPF (Paragraph 15) outlines that the planning system should be plan-led, and these plans should be based on proportionate evidence (Paragraph 35). Shropshire Council's proposed strategy of relying on **new** windfall sites to accommodate 500 dwellings to meet their housing requirements is not based on any actual evidence, and there is no evidence to suggest that such a significant number of these sites exist (as historic delivery cannot be relied on for evidence of this).
- 2.2.39. Table 10.1 of the Sustainability Appraisal estimates that 3,588 dwellings will be delivered through windfall sites across the proposed plan period, equating to 11% of Shropshire's proposed housing requirement. This is unsustainable and does not represent a justified or positively prepared plan, per paragraph 35 of the NPPF; increasing windfall allowances limits the ability to plan Shropshire's growth in a positive manner.
- 2.2.40. This decision to progress this option is based on historic evidence indicating that there are a significant number of windfall sites available in Shropshire, which is based on the policies of the Core Strategy (2011) and SAMDev (2015).
- 2.2.41. The spatial strategies adopted in these plans focused development in rural areas and encouraged windfall development in the community hubs and rural areas (Policies CS4 and CS5). The decision to take forward Option 1, considering the above, is an unsound and unsustainable decision based on flawed evidence. This is as the historic rates of windfall development cannot be accurately used to plot a trajectory for future windfall development as the policy position and spatial strategy context has fundamentally changed (as the draft Local Plan has switched to an urban focus). Therefore, this aspect of the draft Local Plan is inconsistent with NPPF Paragraph 35 in that it is not based on appropriate evidence, rendering it ineffective and unjustified.
- 2.2.42. As such Option 1 is entirely inconsistent with the NPPF (Paragraph 72) which requires windfall allowances to be based on compelling evidence that provides a reliable source of supply and have regard to expected future trends. Instead, the current delivery of windfall sites has been based on a favourable policy position.
- 2.2.43. Further, whilst the historic evidence of windfall delivery in Shropshire is acknowledged, the ability of windfalls to sustain these levels of delivery will diminish over time and such a reliance should not be used as a reason to not allocate sufficient sites and therefore the Plan has not been 'positively prepared'. In this draft Local Plan, there are much greater restrictions on the delivery of housing in community clusters (Policy SP10). Where windfalls are proposed in settlements development boundaries are drawn in such a way as to restrict delivery.
- 2.2.44. Despite the above, Section 8 of the HETP (GC45) determines that Option 1 is the most sustainable option for accommodating the proposed uplift of housing requirement by 500 dwellings. This conclusion is therefore inconsistent with the NPPF for the reasons outlined above.
- 2.2.45. To rectify the above, the draft Local Plan (and the SA) will require amendments to make it robust and sound. There is currently a lot of faith being placed in sites that have not come forward for development in the past five years (despite allocation) or are yet to be identified. As such, a greater buffer should be built into the housing requirement to account for those dwellings that won't come forward during the Plan period. Allocating additional sites can accommodate this.

- 2.2.46. Therefore, instead of progressing Option 1, the Council should progress with Option 3, to increase the number of site allocations and ensure that decisions on planning applications can be truly planned decisions.
- 2.2.47. In the SA, the Council recognise the potential to achieve the proposed uplift in housing requirement through Option 3 (allocating new sites), however indicate that it was not selected due to the increased certainty regarding the urban focus of development with Option 1.
- 2.2.48. We dispute the conclusion that Option 1 is the most sustainable option as it is not justified by the evidence base in GC44 and GC45, particularly as it offers the least certainty. This is recognised in Paragraph 10.63 of GC44, which states none of the reasonable options would result in significant negative impacts or would require mitigation measures. This is echoed by Paragraph 8.75 of GC45 which recognises *“it is difficult or even impossible to identify potential windfall development opportunities before they arise.”* This statement from the Council demonstrates the lack of control over future development this strategy would cause, and further highlights this approach would not result in ‘plan-led’ development. The Plan cannot be positively prepared when the Council make statements such as this regarding their preferred option.
- 2.2.49. In short, the approach of Option 3 would be far more sustainable, provide greater certainty regarding delivery and ensure the Plan is sound by giving specific site allocations to deliver the proposed uplift in Shropshire’s housing requirement.
- 2.2.50. Paragraph 8.60 of GC45 confirms that it would be feasible to assess opportunities to identify additional site allocations (including through the early release of proposed safeguarded land and the identification of new strategic site allocations). While in the SA some sites are reassessed, the explicit exercise to explore new strategic allocations, or the exploration of mechanisms to facilitate the early release of safeguarded land has not been assessed or considered any further.
- 2.2.51. We have discussed the merits of such a policy mechanism within paragraph 2.2.7 of these representations and the Raby Estate’s Hearing Statement at the Duty to Cooperate Hearing Sessions (ADTC.04 A0149), and per our comments in these previous representations, and the Council’s own admission, we suggest that the SA considers this as a viable route to provide certainty to the Council’s housing delivery.
- 2.2.52. In addition to the above, given the noted positive potential contributions of Option 3, Option 4 (a combination of two or more of the other options) should at least be considered, in recognition that that none of the reasonable options would result in a significant effect or would require mitigation measures (paragraph 10.63 of GC44).
- 2.2.53. To assist with this approach, the Raby Estate’s site at Beslow (BWU001), subject to securing planning permission, is available for immediate development and is unconstrained by technical and policy constraints (such as Green Belt designations. Beslow presents a potential site allocation where the contribution of 1,500 dwellings towards the Black Country, and the uplift of Shropshire’s housing requirement by 500 dwellings can be met in full, while presenting opportunities to meet Shropshire’s social and economic needs. This is explored in greater detail in Section 3 of these representations. By considering Beslow, and updating the SA assessment, the draft Plan could then move towards being justified.

SITES TO ACCOMMODATE THE PROPOSED 1,500 DWELLINGS CONTRIBUTION TOWARDS THE UNMET NEED FORECASTS TO ARISE WITHIN THE BLACK COUNTRY

- 2.2.54. This section comments on Section 12 of the SA (GC44) and Sections 9 and 16 of the Housing and Employment Topic Paper (GC45). These sections consider the matter of accommodating the 1,500 dwellings to meet the Black Country unmet need.
- 2.2.55. This assessment has been undertaken as the Inspectors identified (in ID28) that for the purposes of effectiveness, the Council will need to consider which site(s) would meet the need of the Black Country, and assess the sustainability of this against the objectives and geographical scope of the Plan.
- 2.2.56. In relation to unmet needs from the Black Country, it is recognised that it would be favourable to encourage development in the A5/ M54 corridor. This is as development should come forward in areas that are located as logically as possible to where the housing need is. The A5/M54 corridor is the arterial route into the Black Country from Shropshire and therefore has the best relationship with the Black Country (ie the area that the houses are serving). This will make migration/ commuting in and out of both the corridor and the Black Country as easy as possible for future residents.
- 2.2.57. Per our above assessment, Paragraph 12.30 of the SA concludes that sites within central or eastern parts of Shropshire should be considered to accommodate the proposed contribution to the Black Country. Specifically, the place plan areas of Albrighton, Bridgnorth, Broseley, Highley, Much Wenlock, Shifnal, and Shrewsbury are listed. Shropshire advise that these areas were selected owing to the transport connections, migration, and commuting patterns.
- 2.2.58. The Council recognises that strategic sites within the Shrewsbury Place Plan Area will be able to meet this criteria. This recognition is welcomed and supported. However, the sites now selected to accommodate the unmet needs of the Black Country were previously allocations for Shropshire's housing requirement. The Inspectors in ID28 and ID37 requested the assessment of this be a separate exercise. Of the sites shortlisted (BRD030, SHR060, SHR158, SHR161 and IRN001), several have not scored positively in the Site Assessment, particularly for the purpose of the Black Country's need, therefore it is not clear or justified why these specific sites are being taken forward.
- 2.2.59. Paragraph 9.7 clarifies that the Council re-assessed all available sites within the reasonable assessment geography, and continued to use the Stage 2b filters, including size and availability. Section 12 of GC44 identifies what is considered a reasonable assessment geography, with paragraph 12.38 detailing the 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.
- 2.2.60. Within this reasonable assessment geography is potential strategic settlements/sites within Shrewsbury Place Plan Area. However, as illustrated in SD005.16a (Draft Shrewsbury Place Plan Area Inset Maps), this covers a large area, extending from the Wrekin at its eastern extent, to the Welsh border at its western extent. While it is recognised that areas within the Shrewsbury Place Plan Area are in proximity to the Black Country, not all are of relevance for accommodating the Black Country's unmet housing needs. This is particularly relevant to draft allocations SHR060, SHR158 and SHR161, which are proposed to meet the Black Country unmet need, but located to the west of Shrewsbury.

- 2.2.61. Figures 12.1 and 12.2 show the internal migration patterns at a sub-Shropshire level between Shropshire and the Black Country, and Figures 12.3 and 12.4 of GC44 highlight commuting patterns, using Place Plan Areas to understand the spatial variation of this across the county. However, in using these to divide Shropshire and understand the spatial variation, the conclusions have been overgeneralised and identify the likely dependencies between the Black Country and the area including and east of Shrewsbury as those for the whole Place Plan Area, including the areas closest to the Welsh border. In doing this, the whole Place Plan Area has been identified as a reasonable assessment geography for accommodating the Black Country's unmet needs. This is an inappropriate assumption, and conclusions of suitable sites should not be based on a geography of this scale.
- 2.2.62. This simplification of the analysis of commuting patterns has been reflected in the proposal for the site at Land between Myton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 and SHR161) to accommodate 300 dwellings of the proposed 1,500 dwelling contribution to the Black Country.
- 2.2.63. The site is located to the west of Shrewsbury and is not within the section of the Place Plan Area that is closest to the Black Country. Instead, it is clear that the proposed allocation is best suited to accommodating Shropshire's housing requirement, rather than being of relevance to the Black Country. Therefore, the analysis shown in Figures 12.1-12.4 should use smaller sub-areas to highlight the spatial variation in interdependencies between Shropshire and the Black Country at a finer level. This would better inform the conclusions made on reasonable assessment geography, enabling the area east of Shrewsbury to be a targeted area of search, rather than the whole Place Plan Area.
- 2.2.64. It is apparent that the chosen site allocations have been selected as the most suitable of the existing list of proposed site allocations, as per the Inspectors' concerns in paragraph 15 of ID36. Furthermore, the list of proposed sites to accommodate the Black Country's unmet housing need are not proposed to accommodate this in full, instead spreading this between three locations. It is unclear why this is the case, particularly given these options' poor scores for the purpose of the Black Country's need.
- 2.2.65. As we have previously outlined during our representations to earlier stages of the Local Plan consultation and our previous hearing statements, the Raby Estate has significant landholdings in the east of Shropshire and is proposing a garden community at Beslow.
- 2.2.66. As such, Beslow is in a suitable location to accommodate the Black Country's unmet housing need, within the east of the Shrewsbury Place Plan Area. Due to this, it is more likely to have a functional relationship with the Black Country, compared to SHR060, SHR158 and SHR161, and should be considered as a more appropriate site through the conclusions of the reassessment of all sites within the reasonable assessment geography, per paragraph 9.10 of GC45.
- 2.2.67. Until this exercise has been completed, and this cross-boundary issue is addressed, the draft Plan will remain unsound (per Paragraph 35 of the NPPF), as it wouldn't be justified (as the evidence hasn't considered all reasonable options) or effective/positively prepared as strategic cross-boundary issues remain unaddressed.
- 2.2.68. Beslow is well-located to be considered as an allocation, or reserve site (if required) to meet unmet need from the Black Country and has already been considered within the consultation of the Local

Plan. Details of the site's merits and the Raby Estate's vision can be found at Section 3 of these representations.

2.3 STRATEGIC DISTRIBUTION AND SPATIAL STRATEGY

STRATEGIC DISTRIBUTION OF PLANNED DEVELOPMENT

- 2.3.1. This section comments on Section 13 of the SA (GC44) and Section 19 of the Housing and Employment Topic Paper (GC45) which outline Shropshire Council's proposed spatial strategy and strategic distribution. The Council outline there were three options:
- A - Rural Rebalance
 - B - Urban Focus
 - C - Balanced Growth
- 2.3.2. Shropshire Council state Option B (Urban Focus) is the most sustainable option, citing the existing infrastructure present to support future growth. However, this conclusion lacks an awareness of the rural nature of Shropshire, and the requirement to balance development throughout the county to promote sustainable growth in rural areas.
- 2.3.3. The shift in approach from the adopted Core Strategy to an urban focus restricts growth in rural areas where Shropshire has successfully relied on consistent rates of delivery and completions. We have considered this (and the subsequent outcomes for windfall rates) in detail in section 2.2 of these representations.
- 2.3.4. Given the dispersed location of the principle and strategic centres there is also a disproportionate level of growth in different geographic regions of the local authority area. This is particularly true for the Much Wenlock Place Plan area where levels of planned growth in settlements where the population currently meets its day-to-day needs (Cressage and Much Wenlock) is low in comparison to the scale of the population.
- 2.3.5. This is a fundamental flaw of a development plan in what is a predominantly rural authority, meaning the plan is not justified and will struggle to be effective (per Paragraph 35 of the NPPF). As outlined above, the Plan should be refocused to promote balanced growth, and in this instance should therefore give greater focus to rural development and encourage growth in the rural local authority area.
- 2.3.6. To ensure a balanced approach, the strategy should focus on a need to find new strategic sites outside of the Green Belt, to appropriately account for the housing requirements of Shropshire and the unmet needs of the Black Country.
- 2.3.7. This would also enable a holistic approach to planning by ensuring that housing and employment land can be co-located, aligning growth with the necessary infrastructure (per NPPF Paragraph 11 concerning sustainable development).

2.4 SUMMARY

- 2.4.1. The Raby Estate believe that Shropshire Council have inadequately updated the Site Assessment to inform the Sustainability Appraisal, and although have shown evidence of reassessing sites for the specific purpose of accommodating the Black Country's unmet housing and employment needs, these findings have not informed the conclusions made on proposed site allocations in GC45.



- 2.4.2. The additional material prepared by Shropshire Council has not justified that there are no reasonable alternatives to Green Belt allocations. This is particularly the case as the exceptional circumstances given to allocate SHF108b and SHF018d relate to Shropshire's own need, despite the majority of the allocation being proposed for the Black Country's unmet employment land need (30 hectares of a total capacity of 39 hectares).
- 2.4.3. Until the above is addressed, and the Council have a) prepared the evidence base (in the form of the SA); and b) applied this evidence base to the draft Plan's proposed strategy, the draft Local Plan cannot be considered to be sound as it hasn't been positively prepared and isn't justified.

3 BESLOW

- 3.1.1. This section of the representations outlines the opportunities the Raby Estate's site at Beslow present towards meeting the housing needs of Shropshire and the Black Country. The site is solely owned by the Raby Estate, free of technical constraints and available for delivery immediately once planning permission has been secured.
- 3.1.2. As detailed in the previous section, Shropshire Council have inadequately updated the Site Assessment to inform the Sustainability Appraisal, and although have shown evidence of reassessing sites for the specific purpose of accommodating the Black Country's unmet housing and employment needs, these findings have not informed the conclusions made on proposed site allocations in GC45.
- 3.1.3. The Sustainability Assessment should be fully updated to reflect the nuances of Beslow, particularly in comparison with the proposed site allocations, and be informed by the updates to Beslow that reflect its potential as a strategic site.

3.2 SITE PROMOTION CONTEXT

- 3.2.1. The Raby Estate's site at Beslow (BWU001) lies in the Shrewsbury to Telford and West Midlands strategic growth corridor, an area identified for economic investment. The site is the closest strategic site on the M54/A5 corridor to the Black Country and importantly, is not in the Green Belt or the Shropshire Hills National Landscape. Significantly the site is in single ownership (by the Raby Estate) and is available now to come forward for development.
- 3.2.2. This means Beslow, specifically the BWU001 site, is extremely well-placed to deliver new homes, employment and community uses which can meet Shropshire's economic and social needs, and be of significance for the wider West Midlands region.
- 3.2.3. The Raby Estate has promoted Beslow as a new Strategic Settlement throughout the Shropshire Local Plan Review's preparation and examination.
- 3.2.4. Beslow deserves more thorough consideration than was given in the Sustainability Appraisal's site assessment process, which does not get to the heart of the site's opportunities and makes several incorrect assumptions regarding the technical delivery of the site. The site is the only reasonable alternative to allocating additional Green Belt land in the east of the Authority, and provides significantly more certainty regarding delivery when compared to several hundred yet-to-be-found windfall sites.
- 3.2.5. Beslow (BWU001) was previously given a rating of 'Fair' (and a score of -12) in the SA (ref: SD006) for the draft Local Plan, which is stronger than other sites taken forward by the Council. The matrix can be found at SD006.21. The key matters identified concerned access and heritage. As such a Highways and Transport Masterplan Strategy and Historic Environment Baseline Assessment & Constraints and Opportunities Report have been prepared to support revisions to the scheme. These studies are provided at Appendix B and C of this document, and the findings of which are summarised in the following section.

3.3 ADDITIONAL TECHNICAL WORK

3.3.1. As outlined above, the Raby Estate have undertaken additional technical work to address comments made in the SA, and demonstrate that the Site Assessment for Beslow has not been updated, instead reflecting the Council's perceived constraints for the site.

MASTERPLAN

3.3.2. The Raby Estate have developed an illustrative masterplan for Beslow, which was first developed by URBED, drawing upon the principles of David Rudlin's Wolfson Prize winning proposal for the fictional town of Uxcester. David is now with BDP who have taken on the role of master planner retaining the same principles.

3.3.3. The Raby Estate as a long term, responsible landowner is committed to promoting a new community in the spirit of the garden city, a place that supports a strong community, provides a full range of facilities and services, is zero carbon, beautifully designed and well connected by public transport to Telford and Shrewsbury.

3.3.4. The master plan proposes a new settlement of 3,500 homes with a population of around 7,000 and 64,000sqm of employment space supporting around 3,000 jobs. The plan includes junior school and secondary schools plus a traditional town centre full of shops and small businesses. The master plan is illustrated on the following drawings and seeks to achieve these objectives.

3.3.5. In support of the promotion of the Beslow site, the following has been provided at Appendix A:

- BDP vision;
- Illustrative masterplan;
- Land use plan;
- Open space plan;
- Access and road hierarchy plan; and
- Archaeology plan.

HIGHWAYS AND TRANSPORT MASTERPLAN STRATEGY

3.3.6. The Stage 3 Site Assessment (GC44) outlines the Highways Comments for Beslow, concerning the site's lack of highway frontage at present, and the location of the nearest bus service a distance from the site. Shropshire Council's concerns for the site regarding this are reaffirmed in Paragraph 16.167 of GC45 which states that the site is some distance from the M54/A5 strategic corridor.

3.3.7. The Highways and Transport Masterplan Strategy note, produced by Mode, considers the transport opportunities provided by the proposed development at this location, including access by sustainable transport modes and vehicular access junction arrangements. It specifically seeks to address the highways comments raised in the Sustainability Appraisal.

3.3.8. The note highlights Beslow's strategic location, benefiting from proximity to Shrewsbury and Telford with links to the Strategic Road Network providing access to both. The site is located along the M54/A5 corridor, and it is noted that sustainable travel opportunities do exist for the area, such as local bus services and National Cycle Route 45.

3.3.9. The note also considers vehicular access options for the site, concluding that primary and secondary access can be delivered within land controlled by the Raby Estate. The internal road

network would be designed in accordance with SCC's Residential Design Guide and Manual for Streets.

- 3.3.10. The aims of the Shrewsbury Moves Strategy and the sustainable travel strategy for the site are aligned, aiming to reduce car trips and increase the use of sustainable modes of travel. The introduction of the Parkway Station to the east of Shrewsbury results in the site being well-located to support sustainable travel across the West Midlands Region for future residents.

HISTORIC ENVIRONMENT BASELINE ASSESSMENT REPORT

- 3.3.11. As established, both the previous Sustainability Appraisal, and the revised Sustainability Appraisal, both state that the development has the potential to have an undue impact on the setting of Wroxeter Roman settlement, and associated heritage assets. These findings do not accurately represent the situation at Beslow, and the Raby Estate have therefore commissioned an independent heritage assessment to demonstrate the development will not negatively impact the setting of the assets, and highlight that both the heritage assets and development can be enhanced.
- 3.3.12. The assessment prepared by Heritage Archaeology (found at Appendix C), recognises that the development at Beslow has the potential to impact buried archaeology during the construction phase, and longer-term impacts on the setting on the assets.
- 3.3.13. However informed and iterative masterplan development has allowed for significant known archaeology within the Site to be retained in situ and conserved within the proposals. The proposals go further in allowing for significant heritage benefits through the positive management of archaeological features within areas of proposed parkland and rewilding. Links between the Site and the Roman town would allow for the hinterland to be better understood and more accessible.
- 3.3.14. The ongoing design would be further informed by a programme of desk-based assessment and non-intrusive surveys to better understand the archaeological potential of the development site.
- 3.3.15. Further landscape studies could augment existing proposals to ensure that any impacts on the settings of Wroxeter Roman Town Scheduled Monument and All Saints Church Uppington Grade II* listed building are minimal.
- 3.3.16. Based on the findings of the Heritage Archaeology assessment, we recommend that the Sustainability Assessment is updated to account for the findings of the report, and recognise that the fact that any impact on heritage assets can be avoided through a masterplanning exercise, and any development in this area can increase the public's access to these assets.

3.4 SUSTAINABILITY APPRAISAL AND HOUSING TOPIC PAPER

- 3.4.1. As outlined in the introduction, these representations focus on areas of the additional Local Plan Examination material that have made inappropriate conclusions regarding Beslow, particularly in relation to the proposed site allocations.
- 3.4.2. The conclusion of the assessment made regarding Beslow (ref BWU001) in GC44 does not reflect the opportunities of the site and over-emphasises concerns for other factors. The revised Sustainability Appraisal (GC44) does not update the assessment of Beslow, compared to the GC29 (August 2023) and SD006 (September 2021) versions of the document. Therefore, it is apparent that the site was not considered as a potential site to meet the 500 dwelling uplift or meet the 1,500-dwelling contribution to the Black Country's unmet need further than the Stage 3 Site Assessment.

- 3.4.3. This assessment gives an overall conclusion of the site as 'Fair' for the overall and the Black Country contribution, scoring -12, which is consistent with the previous considerations.
- 3.4.4. Table 12.3 details the identified site allocations to accommodate the proposed contribution of 1,500 dwellings to the Black Country towards their unmet need. However, the conclusions of this are not consistent with the method and conclusions in Stages 2a and 3 of the Site Assessment, as shown in Table 12.4.
- 3.4.5. Table 12.4 details that the Overall Black Country Contribution Sustainability Conclusion for the proposed site allocations for Shropshire's contribution of 1,500 dwellings to the Black Country are 'Fair', 'Fair' and 'Poor', for BRD030, SHR057&SHR177 and IRN001, respectively. Not only are these scores lower than existing proposed site allocations for Shropshire's housing requirement, but they are lower than other sites assessed in the SA, including Beslow.
- 3.4.6. This section of the representations considers the comments made in both assessments and provides evidence to demonstrate that the matters that resulted in the site not being taken forward for allocation can be addressed. We have addressed each of these in turn below.

Contribution to the Black Country's unmet need

- 3.4.7. The Stage 2a and 3 Assessment in GC44 recognises that Beslow has a functional relationship with the Black Country due to its location in central Shropshire, links to the A5/M54 corridor, and railway station with direct connections to the Black Country. The Assessment rates it -12, which is 'Fair'.
- 3.4.8. While this is generally positive, and the recognition of the functional relationship to the Black Country is supported, comments made by the Council in GC45 need addressing and updating, as they are inconsistent with the Council's comments in the SA.
- 3.4.9. The Raby Estate's site at Beslow (BWU001) lies in the Shrewsbury to Telford and West Midlands strategic growth corridor, an area identified for economic investment. The site is the closest strategic site on the M54/A5 corridor to the Black Country and importantly, is not in the Green Belt or the Shropshire Hills National Landscape. The site is circa 13 minutes from Telford and 18 minutes from Shrewsbury, from which the approximate journey time by train to Birmingham New Street is 1 hour 10 minutes.
- 3.4.10. This means Beslow, specifically the BWU001 site, is extremely well-placed to deliver new homes, employment and community uses which can meet Shropshire's economic and social needs and be of significance for the wider West Midlands region.
- 3.4.11. GC45 (paragraph 16.167a) states that while the site is in proximity to the M54/A5 corridor, it is some distance from it, and therefore any connection to the Black Country would be via B-roads. While it is correct that access to the A5 would initially be from the B4380 via B5061, it is completely unrealistic to expect a site to have direct access from a road such as the A5.
- 3.4.12. From the site, it takes circa seven-minutes to be on the A5 (east of Shrewsbury) and onto the strategic corridor. The comments made by the Council on this matter are therefore misleading and do not reflect the reality of the site's strategic location on the A5/M54 corridor.
- 3.4.13. Part b) of GC45 Paragraph 16.167 states that owing to the above, the Council question whether this would be an attractive centre for employment. In response to this, we reiterate the above and flag that Beslow is the closest strategic site on the A5/M54 corridor to the Black Country, not constrained by Green Belt. The site is currently accessible by private car, public bus and active travel methods,

and this would be improved upon the fulfilment of the proposed measures in the Transport and Highways Strategy, and supported by the interventions proposed in the Shrewsbury Moves consultation.

- 3.4.14. Further, the Raby Estate's vision for Beslow is to encourage commercial businesses to the site, that are reflective of the site's location and rural setting. These include agri-tech, agri-food and food and drink processing. These areas have been highlighted as a priority by Invest in Shropshire, whom state "*Agri-Tech is one of the fastest growing sectors in the UK, with global markets forecast to reach £217bn by 2021*"¹. Draft Policy SP12 of the Local Plan outlines the importance of ensuring opportunities for expansion and investment in the agri-food, agri-tech and food/drink processing sectors.
- 3.4.15. Therefore, the commercial provision at Beslow is appropriate for Shropshire and sensitive to its rural setting. This would ensure it is an attractive centre for employment. This would be further aided by the residential provision at Beslow, promoting a sustainable mixed-use development.
- 3.4.16. Therefore, as per the above, Stages 2a and 3 of the Sustainability Appraisal, and the findings of GC45, should be updated to reflect Beslow in an accurate way and highlight the high potential for the site towards the housing needs of Shropshire and the Black Country. At present, the Sustainability Appraisal does not comply with paragraph 31 of the NPPF, which seeks that all policies should be underpinned by relevant and up-to-date evidence.
- 3.4.17. As outlined earlier in our representations, the current strategy identified in the SA is to provide an uplift of 500 dwellings through windfall sites and provide part of 1,500 dwellings for the Black Country on a site west of Shrewsbury. This is illogical and is not reflective of a positively prepared or justified plan.
- 3.4.18. The Beslow site, as recognised in GC44 (and despite the conflicting comments made in GC45) is well-placed in relation to the Black Country and West Midlands owing to its optimal location on the strategic A5/M54 corridor. As such, a strategic site allocation in this area would be of strategic importance to Shropshire, the Black Country and the West Midlands as a whole; the Council should reconsider their assessments in GC44 and GC45 and recognise this.

Transport and access

- 3.4.19. Criteria 6 of the Stage 2a Site Assessment and the Highways Comments of the Stage 3 Site Assessment concerns the site's accessibility by sustainable modes of travel, and how it will integrate into the existing highways network, particularly around the site access.

Sustainable transport

- 3.4.20. In the Stage 2a and Stage 3 Site Assessments the site is currently negatively marked, as the site's boundary is not within 480 metres of a public transport node. This lacks nuance regarding how sustainable new towns are brought forward for development.

¹ <https://www.investinshropshire.co.uk/relocating-and-investing/sectors/agritech/>

- 3.4.21. This has been challenged by the Highways and Transport Strategy proposed by Mode, which flags the route of the 96/96A bus service along the site's southern boundary and provides a direct service to Shrewsbury and Telford bus stations. Existing bus stops are provided on Roman Road (B5061), indicating that there has previously been a regular bus service operating along the site's northern boundary. This is complemented by the proposed interventions highlighted in the note, ensuring that the majority of the development will be within 400 metres of a public bus stop. This will be accompanied by the future parkway station east of Shrewsbury, and use of active travel measures.
- 3.4.22. Comments outlined in the Stage 3 Site Assessment for Beslow flag that the nearest bus service from the site is "800km away". This lacks nuance regarding how strategic sites and new settlements are delivered and is factually incorrect. We believe this should read "800m away" and we request that this is updated.
- 3.4.23. As highlighted in the Transport Strategy, there is an existing bus service (96/96A) along the southern boundary of the site, and evidence of a previous bus service (that could be reinstated) along the site's northern boundary. This, alongside proposed interventions, would enable most of the development to be within 400 metres of a bus route.
- 3.4.24. A wide range of rail services are available from Shrewsbury and Telford Railway Stations, that enable access to central Birmingham in just over an hour. Further, Shrewsbury Town Council have consulted on proposals to bring forward a new Parkway Station to the east of the town. This will be in proximity to the Beslow site, and further increase its access to sustainable modes of travel. Forward-thinking plan making would suggest that houses should be well-located to services and transport hub, therefore there is a clear synergy between these proposals that could be brought forward together.
- 3.4.25. The above is considered in greater detail in the Transport Masterplan and Strategy submitted alongside these representations. It confirms that through relatively minor interventions (such as reinstating bus stops through developer contributions), the site could be well connected to both Shrewsbury and Telford, and therefore the wider West Midlands through the rail network.
- 3.4.26. It is also clear that there are ambitious plans to increase the accessibility of Shrewsbury over the coming years (with the development of a Parkway Station one of many interventions proposed). This will demonstrate a clear direction of travel towards directing development to the east of town and strategic locations on the A5/M54 corridor to make the most of the connections between Shrewsbury, Telford and the Black Country.
- 3.4.27. This demonstrates that the conclusions of the SA (GC44) regarding the sustainable transport options and accessibility of the Beslow site are significantly lacking in any kind of nuance or recognition that infrastructure will be delivered alongside any strategic site/new town. Further there is a failure to recognise how the site fits.
- 3.4.28. We recommend that the Site Assessment is revised to reconsider this matter and provide a degree of nuance regarding this situation. It is unrealistic to expect strategic new towns to have infrastructure in place prior to development. The key point is that these facilities can be secured by reinstating previous stops, which can be secured through the development and a suitably worded allocation.
- 3.4.29. Site access

- 3.4.30. The lack of existing site access is raised in the Highways Comments of the Stage 3 Site Assessment. However, whilst this acknowledges that the site does not currently have highway frontage, it is noted that two suitable highways access junctions should be achievable via neighbouring land.
- 3.4.31. Section 4 of the Highways and Transport Strategy by Mode presents a strategy for achieving vehicular access to the strategic site from the Local Highway Network, which is supported by the access points shown in the feasibility masterplan produced by BDP (Appendix A). Primary access would be accommodated from Roman Road, with a roundabout junction deemed the most appropriate.
- 3.4.32. Secondary access would be formed by a simple priority junction with the B4380, designed in accordance with DMRB and Manual for Streets. This would also be of suitable size to enable bus movements into and out of the proposed development.
- 3.4.33. Therefore, whilst the site does not currently have access to the Local Highway Network, the Highways and Transport Strategy has demonstrated that suitable primary and secondary access can be achieved. Therefore, the site should not be discounted on the basis of not currently having access to the highways network, as this is unrealistic given the nature of the site.

Heritage and archaeology

- 3.4.34. We note that the Stage 2a Site Assessment does not flag criteria 13 or 14 as a concern; the site does not contain and is not within a buffer zone of a designated heritage or archaeological asset. As such, Beslow receives a neutral score ('0') for these criteria, implying that the proximity of Wroxeter to Beslow is not a concern. However, in the Stage 3 Site Assessment comments are made regarding the potential impact of Beslow on the setting of Wroxeter (a Scheduled Ancient Monument) and the associated cropmarks. These comments are also repeated at paragraph 16.167 of the Housing and Employment Topic Paper (GC45).
- 3.4.35. The proposed site allocations, for Shropshire and the Black Country's unmet housing need, are deemed the most suitable options, despite the recognised potential impacts on designated sites and a concern for the need to mitigate these impacts. Site IRN001 (Ironbridge Former Power Station) ranked 'Poor', with a score of -19, which is significantly worse than Beslow's score of -12.
- 3.4.36. Table 12.6 and Paragraph 12.100 of the SA recognise the poor performance of the site in the context of the SA objectives, and highlights the likely significant adverse effects of a development on the site on designated sites for ecology and heritage, for which mitigation measures will be required. Despite this, Shropshire Council continue to maintain the view that the site is in an appropriate location to accommodate a portion of their contribution to the unmet housing need of the Black Country, on the basis that mitigation is possible. However, this is the case with other sites, including Beslow, and should be considered consistently throughout.
- 3.4.37. As such, it is unclear what has set these sites apart from others; the conclusions of the SA and proposed site allocations do not appear to directly draw from the conclusions of the Site Assessment. Therefore, as per paragraph 32 of the NPPF, the proposed allocations have not been sufficiently informed by the SA, nor avoided significant adverse impacts on the plan's objectives. The SA, and our updated assessment of Beslow, have highlighted that there are alternative options that reduce or eliminate such impacts, and should be proposed instead of the sites in Table 12.4.

- 3.4.38. These comments have been reviewed by Heritage Archaeology, and a Historic Environment Baseline Assessment & Constraints and Opportunities Report has been produced in response. This aims to determine the nature, extent and value of any heritage assets that could be affected by development within the site.
- 3.4.39. The findings of this study have been considered by the Estate and factored into a revised illustrative masterplan for the site. This masterplan demonstrates that all areas of heritage interest can be avoided (with appropriate buffers) and there will be no harmful impact of the development. In fact, a key aim for the Raby Estate is to enable the heritage assets, particularly the Roman Settlement of Wroxeter, to be enjoyed and experienced, enhancing the heritage value of the asset.
- 3.4.40. The Heritage and Archaeology Note prepared by Heritage Archaeology (Appendix C) challenge these concerns, confirming that it is unlikely that there will be a negative impact on the setting or significance of Wroxeter or other heritage assets (designated or non-designated).
- 3.4.41. With the informed masterplan development that has occurred, and ongoing design to be further informed by a programme of desk-based assessment and non-intrusive surveys, the current proposals are consistent with the policy requirements of the NPPF, Section 16; paragraph 207 (regarding substantial harm to heritage assets) would not be engaged.
- 3.4.42. In short, any impacts arising from the development will avoid harm on the heritage assets, and the scheme will be designed to enhance their setting, allowing them to be enjoyed and appreciated by future residents and members of the public.
- 3.4.43. In light of this, we recommend that the Council re-assess the site and have due consideration of the information provided in these representations. We expect that following a review of the revised masterplan and supporting information, the Council's conclusion will now be significantly different, and the consideration of the site will be positive in respect of the impact heritage and archaeology.

Green Belt

- 3.4.44. Beslow has not been assessed against Criteria 15 of the Stage 2a Assessment. The site is not located within or in the setting of the Green Belt, which this lack of assessment has not emphasised as a positive element of the site, compared with others within the site assessment. This should be considered a significant benefit in favour of the site's allocation. We recommend the site's rating is re-assessed to recognise this.

Facilities and infrastructure

- 3.4.45. By allocating strategic sites of the scale proposed at Beslow, it will allow the social infrastructure required to support a settlement to be tailored to its needs. Therefore, if infrastructure isn't currently in place, it can be introduced and come forward in line with the development.
- 3.4.46. Stage 2a Assessment Criteria 5 relates to the site's proximity to infrastructure and facilities. The site scores negatively due to its location more than 480 metres from a primary school, GP surgery, leisure centre, outdoor sports facility, amenity green space and accessible natural green space; however, as the site is a strategic settlement, this is to be expected, and all required facilities and infrastructure will be provided through the development itself.
- 3.4.47. This is echoed in the Stage 3 Assessment, with the Council suggesting "*unlikely that the scale of development would support a school or GP surgery*". As detailed in the masterplan, these are both proposed as part of the community facilities in the development and, as such, the site should score

positively for this, rather than accessibility to services being a concern. For a development of this size, the infrastructure required for the development will be provided on site, and through developer contributions.

- 3.4.48. A key aspect of the development will be a focus on community, ensuring the development provides strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods, that provide the infrastructure required to create these places. Beslow has been designed using Garden City principles, meaning that green space provision will be a key feature, utilising the rural site and existing public rights of way.
- 3.4.49. These comments can therefore be fully addressed through a suitably worded allocation requiring these facilities as part of the development, to ensure that this crucial infrastructure comes forward at a suitable rate to support the proposed housing.

Flood risk

- 3.4.50. In the Stage 2a Assessment, Criteria 9 concerns flood risk. The SA scores Beslow as negative ('-') in this criteria. This is because a small portion of the site, associated with the River Severn, passes through the site. This area of the site can be fully avoided through masterplanning and therefore should not be a consideration in this assessment. The assessment the Council has undertaken has been oversimplified and is not reflective of the true situation on site.
- 3.4.51. Once again, the assessment criteria lacks nuance on this matter. 97% of the total site area is located within flood zone 1, the flood zone with the least chance of flooding according to the Environment Agency, something which the Council note in the Stage 3 Site Assessment. Additionally, GC44 notes that no part of the site area has been within 20 metres of a historic flood event, further demonstrating that flood risk is not a material concern for development on this site.
- 3.4.52. The masterplanning exercise that has been undertaken when developing the scheme has taken account of the watercourse on site and will avoid development in this area. As such, the assessment of this matter should be updated as this does not prevent development across a significant portion of the site.

Ground water

- 3.4.53. The Stage 2a Site Assessment within the Sustainability Appraisal (GC44), which supports the Housing and Employment Topic Paper, flags the majority of sites within Shropshire as located within a source protection zone.
- 3.4.54. This should not be used as a factor to discount Beslow from future allocations/development, particularly as this can be appropriately addressed and mitigated at a later stage of the planning process.

Ecological considerations

- 3.4.55. Part d) of GC45 Paragraph 16.167 raises the Council's concerns for Beslow in respect of the possible need for an HRA due to the potential impact of road emissions from increased traffic on Hencott Pool. However, this is not an appropriate constraint to flag when looking at Beslow in isolation, as an HRA will be a consideration for all potential strategic sites at planning application stage.
- 3.4.56. Furthermore, the Sustainability Appraisal has recognised the potential impact of proposed allocations (e.g. BNT002) on designated ecological sites, stating that mitigation will be required, but

this is not insurmountable. Therefore, this should not be used as a factor to discount Beslow, particularly as this can be appropriately mitigated at a later stage.

- 3.4.57. Part e) of GC45 Paragraph 16.167 highlights the presence of woodland, mature trees, ponds and a stream/brook (forming an environmental network corridor) as a significant constraint for the Beslow, and a reason for it to be considered an inappropriate site allocation. However, as highlighted in the masterplanning material produced by BDP (Appendix A), the design of Beslow has incorporated existing elements of ecological importance flagged in paragraph 16.167. Existing habitats will be prioritised and enhanced through further interventions. As such, the proposed development at Beslow will not have a detrimental impact on ecological features.
- 3.4.58. Despite Shropshire's proposed site allocations being deemed the most suitable options, there are a number of recognised potential impacts on designated sites and a concern for the need to mitigate these impacts, as covered previously under the Heritage and archaeology section of these representations. Site IRN001 (Ironbridge Former Power Station) ranked 'Poor', and Table 12.6 and Paragraph 12.100 of the SA highlight the likely significant adverse effects of a development on the site on designated sites for ecology, for which mitigation measures will be required. Similarly, Clive Barracks, Tern Hill (BNT002) ranked 'Fair' in the Overall Settlement Sustainability Conclusion, with a final Stage 2a score of -13, and the Stage 3 Site Assessment highlighting the site's potential impact on the River Tern and RAF Tern Hill Local Wildlife Sites.
- 3.4.59. Despite this, Shropshire Council maintain the view that these sites are appropriate locations to accommodate a portion of their housing requirement, on the basis that mitigation is possible. However, this is the case with other sites, including Beslow, and should be considered consistently throughout.
- 3.4.60. Furthermore, 10% Biodiversity Net Gain will be achieved for the proposed development, as per the Environment Act (2021). The ability to achieve this is streamlined due to the site and surrounding land being in single ownership by the Raby Estate.

SUMMARY

- 3.4.61. Appendix 2 of GC44 summarises the findings of the Stage 3 Site Assessment. The conclusions for Beslow have not been updated from previous versions of the Sustainability Appraisal (GC29 and SD006) and present an inaccurate conclusion for the impact of a development on the site. The site's opportunities are not reflected, and the Council's concerns have been overemphasised.
- 3.4.62. The proposed site allocations, for Shropshire and the Black Country's unmet housing need, are deemed the most suitable options, despite the recognised potential impacts on designated sites and a concern for the need to mitigate these impacts. As such, it is unclear what has set these sites apart from others; the conclusions of the SA and proposed site allocations do not appear to directly draw from the conclusions of the Site Assessment. Therefore, as per paragraph 32 of the NPPF, the proposed allocations have not been sufficiently informed by the SA, nor avoided significant adverse impacts on the plan's objectives.
- 3.4.63. The above details the further studies that have been conducted and informed the iterative masterplanning process for Beslow. The SA, and our updated assessment of Beslow, have highlighted that there are alternative options that reduce or eliminate such impacts, and should be proposed instead of the sites in Table 12.

4 LAND AT SHORE LANE, CRESSAGE

4.1 SITE PROMOTION CONTEXT

- 4.1.1. The Raby Estate controls significant land within Cressage along the main route into the village from Shrewsbury and in the historic core of the village between the Old Crown (once a public house) and Wood Lane.
- 4.1.2. The Estate have promoted their site 'Land at Shore Lane' (CES002) as a Preferred Site throughout the Local Plan process. The Preferred Sites consultation document identified two proposed housing allocations in Cressage:
- Land off Harley Road (ref CES005); and
 - The Eagles Former Public House (ref CES006).
- 4.1.3. We have highlighted the significant constraints to the delivery of CES005 and CES006 throughout the Local Plan Review and Examination process, promoting the merits of the land to the west of Cressage (CES002) as a far more suitable and deliverable site that should be allocated for development.

LAND AT SHORE LANE PROPOSAL

- 4.1.4. The Raby Estate has been promoting a mixed-use site at Land at Shore Lane, Cressage. The site provides a unique opportunity to deliver a development of exceptional quality, that meets the needs of the community and is delivered by a landowner/developer that has a long-term interest and stewardship role in the local area, focused on legacy outcomes rather than short-term gain.
- 4.1.5. The proposed development will provide significant benefits for Cressage and wider Shropshire, including residential development on a safe, accessible and deliverable site, with a new pedestrian linkage to improve the connectivity of the village and ensure a cohesive community is facilitated.
- 4.1.6. The proposed development comprises a mixed-use development of up to 80 dwellings, up to 465sqm of employment space and community facilities and associated landscaping. New highways infrastructure, comprising traffic calming measures and access is also proposed, as is the upgrading of a footpath link between the site and the village centre. A significant amount of landscaping, screening and public open space is incorporated into the scheme.

PRE-APPLICATION RESPONSE

- 4.1.7. The Estate has undertaken pre-application engagement with Shropshire Council regarding the Land at Shore Lane site. Shropshire Council issued a positive pre-app response in July 2022 (Appendix D). This confirmed that the site had no insurmountable technical issues that would prevent it coming forward for development and was therefore deliverable.
- 4.1.8. While the pre-application response confirmed that the site was technically deliverable, the pre-application response confirms that any application brought forward on the site at present would be inconsistent with adopted planning policy, as the site is currently located in open countryside. This point is not contested.
- 4.1.9. The pre-app response highlighted some considerations that would need to be demonstrated at a later stage, these included the specifics of the pedestrian route, site access and layout. These have now been addressed through more detailed design work, to highlight that the site remains the only

deliverable site in Cressage and the only viable alternative to draft allocation CES006. These matters have been addressed below:

Pedestrian access

- 4.1.10. At the time of the pre-application, two potential pedestrian access routes to the centre of Cressage from the site were proposed, however the Highways Authority requested that any application brought forward could demonstrate the deliverability/viability of these routes.
- 4.1.11. To address this, a Pedestrian Accessibility Review, prepared by Mode, has been prepared to consider the two proposed routes (via Shrewsbury Road, and via land owned by the Raby Estate) and illustrates that an acceptable walking distance to local amenities can be achieved via either route.
- 4.1.12. While it is recognised that the existing footway widths along Shrewsbury Road are below the minimum width and there is no scope to provide additional widening within the existing carriageway width.
- 4.1.13. This demonstrates the need for the alternative off-road route with associated upgrades to Shore Lane, Crown Lane and Wood Lane. A topographical survey has been undertaken to show that this is deliverable, and the levels involved in this route are accessible and suitable for pedestrians.
- 4.1.14. Further it is recognised that a footbridge will be required to utilise this route. Hydraulic modelling has been undertaken and a quote has been obtained for the required footbridge, showing that this pedestrian route is viable, and most importantly accessible.
- 4.1.15. The full details of this route can be found in the Pedestrian Accessibility Review produced by Mode submitted alongside these representations (Appendix E). This demonstrates that the comments made by the Highways Authority (which were not a barrier to deliverability) can be addressed, and that the future residents will be able to access the centre of Cressage (and the associated facilities) by foot with ease, along a pleasant, safe and accessible route.

Vehicular access

- 4.1.16. An updated access sketch, showing the proposed site access and required visibility splays, has been produced. This shows that safe vehicular access can be provided within Raby Estate land and the adopted highway. This has accounted for a completed arboricultural survey which found both remaining trees along Shrewsbury Road to be sound and requires minimal amendments to the existing situation.
- 4.1.17. This is demonstrated in the technical note provided by Mode, found at Appendix E of the representations.

Layout

- 4.1.18. The pre-application response provided comments on the indicative layout that was provided. It noted that there were areas that the local authority would request were improved ahead of any application being approved. These comments were around density in certain areas of the site and parking.
- 4.1.19. These comments were noted and ahead of any planning application being submitted for consideration, they would be addressed to ensure that the development resulted in a high-quality place. These matters will not impact the technical deliverability of the scheme and would typically be

agreed with the Local Authority through iterative consultation in pre-application discussions prior to the scheme being finalised and an application being submitted.

Visual impact

- 4.1.20. During the pre-application discussions, a comment was made regarding the visual impact of the proposals at Land at Shore Lane on the wider landscape.
- 4.1.21. WSP undertook a photographic survey in early 2023, which identified that the site would not have an adverse visual impact on the wider landscape. An LVIA will inform a future planning application.

Biodiversity net-gain

- 4.1.22. The pre-app highlighted that the delivery of 10% Biodiversity Net Gain (BNG) will be mandatory by the adoption of the Local Plan. A BNG report produced in June 2022 confirmed that this level of BNG is achievable for the site using land within the Raby Estate's ownership. This was confirmed by Shropshire Council in their pre-app feedback (Appendix D).

SUMMARY

- 4.1.23. The site is technically deliverable and would create a logical extension to Cressage. The technical deliverability of the site has been recognised through the pre-application response from officers at Shropshire Council, and the queries they had regarding the pedestrian and vehicular access have been reviewed and addressed. As such, the site represents the only deliverable and viable site to meet the housing needs of Cressage.

4.2 SUSTAINABILITY APPRAISAL AND HOUSING AND EMPLOYMENT TOPIC PAPER

- 4.2.1. This section outlines areas of the additional Local Plan Examination material that have made conclusions based on out-of-date evidence, specifically relating to the proposed site allocations within the Community Hub of Cressage, and the draft allocations the Plan proposed.
- 4.2.2. The evidence base (e.g. Sustainability Appraisal SD006 and associated appendices, Hierarchy of Settlements Assessment EV060, Infrastructure – Much Wenlock Place Plan EV067.13) for the draft local plan sets a local need for c. 80 new homes in Cressage. The Land at Harley Road ('The Vicarage') is a draft allocation for 60 dwellings, which is a considerable shortfall in delivery.
- 4.2.3. The draft Local Plan currently proposes to allocate the land at the Vicarage (Site Assessment ref: CES005) for the development of up to 60 dwellings. An application (LPA ref: 21/01022/OUT) for up to 60 dwellings was then submitted in March 2021. This application went through a number of design iterations as it was unable to demonstrate that safe access could be achieved.
- 4.2.4. The application was subsequently refused by Shropshire Council in June 2023, with an outstanding objection from the Highways Authority, and the key technical reason for refusal being the failure to be able to demonstrate a safe or deliverable site access. This decision was not appealed by the applicant and the timeframe in which to do so has now passed.
- 4.2.5. Despite the un-appealed refusal on the site (for insurmountable technical highways safety issues), neither the Sustainability Appraisal or the Housing and Employment Topic Paper have been updated to reflect this. We provide commentary on this below, and recommend that the documents are reviewed, and the relevant assessments updated. Without this, the proposed allocations and wide strategy for delivering housing cannot be considered sound.

- 4.2.6. Tables 8.2 and 8.3 of GC45 list the Proposed Residential Allocations and their delivery forecasts. Within this table, there are no notes given for CES005 (The Vicarage, Land Off Harley Road) regarding its expected delivery. This is despite the refusal of planning permission (ref 21/01022/OUT) for up to 60 dwellings for the following reasons:
- The site's access is unsuitable for development, and off-site highway works to make the site safe are unachievable;
 - The applicant has been unable to demonstrate that a net gain of biodiversity can be delivered; and
 - Landscape impacts have not been overcome.
- 4.2.7. For CES005, the reasons for refusal of application 21/01022/OUT are insurmountable. The application had four design iterations, yet was still refused due to significant flaws of the site. Therefore, there are significant obstacles to its delivery, which have not been reflected in the preparation or update of the local plan's evidence base.
- 4.2.8. Although Table 8.2 has noted the granting or pending consideration of applications that concern other proposed allocations, there has been no note of the refusal of the Vicarage (CES005).
- 4.2.9. The application's refusal should be noted here, and highlighted in an updated assessment of the site. It is evident that an updated assessment has not been completed, and that the proposed allocations are based on inaccurate understandings of site delivery.
- 4.2.10. To ensure the plan's proposed allocations are suitable, they should be underpinned by relevant and up-to-date evidence (per NPPF paragraph 31), such as updates on planning applications relating to the site. Without this, the plan cannot be found sound, as the allocations cannot be proved to be deliverable over the plan period (effective), as per NPPF paragraph 35.
- 4.2.11. The revised Housing and Employment Topic Paper assesses reasonable options to accommodate the proposed 500 dwelling uplift to Shropshire's housing requirement (Section 8) and reasonable options to accommodate the proposed 1,500 dwelling contribution to the Black Country. However, GC45 does not, in doing this, reassess the general suitability of the proposed allocations in the context of updates since the plan was submitted to examination in 2021. For the assessment of reasonable options for further housing requirements to be conducted appropriately, each site should be reassessed in full to ensure these conclusions are substantiated. It is clear in GC44 that this process has not been undertaken.
- 4.2.12. There is a need for all sites to be reassessed, not just those underpinning the specific elements the Inspectors have explicitly asked to be covered following the Duty to Cooperate Hearing Sessions and the publishing of GC29. The conclusions made in GC44 and GC45 regarding reasonable options have been based on out-of-date evidence, which is contrary to NPPF paragraph 31.
- 4.2.13. Although Table 8.2 has been produced for the purpose of assessing the ability to increase the boundaries or densities of proposed residential allocations (Option 2 of identifying the preferred option to accommodate the proposed uplift to the housing requirement), rather than providing a general update following a reassessment of the proposed allocations, this remains a key element in understanding the deliverability of the site. On the basis of an updated assessment, which is required to ensure the proposed allocations are suitable, the Vicarage (CES005) should not be a proposed allocation.

- 4.2.14. As such, there is a need for (a) new site allocation(s) within Cressage. As detailed in Section 2 of these representations, Land at Shore Lane (CES002) is a suitable and deliverable site, per NPPF paragraph 8, that presents an appropriate alternative to CES005. The positive pre-app response received in July 2022 highlights this, and further work has taken place following this to ensure all concerns have been accounted for and the site can be delivered.
- 4.2.15. Resulting from this, Shropshire Council should move forward by redrawing the settlement boundary for Cressage and allocate CES002 in the draft Local Plan.
- 4.2.16. This will require an amendment through the Main Modifications stage of the Local Plan Examination, which, based on comments made by the Inspectors to date, will be required regardless of the allocation in Cressage. Without such a modification, the Plan will have an un-deliverable allocation, and the housing growth that it is required in Cressage will not be possible.

5 SUMMARY

- 5.1.1. In short, the Raby Estate is promoting two sites for development in the draft Local Plan: the proposed new settlement of Beslow New Town (site ref: BWU001) and the Land at Shore Lane, in the village of Cressage (site ref: CES002). These sites are available for development immediately (subject to achieving the necessary planning permissions) and (if progressed) will make a significant contribution to both Shropshire and the Black Country's housing need.
- 5.1.2. While Shropshire Council have published a new SA (GC44) and HETP (GC45) to address the concerns of the Inspector, the Estate is concerned that Shropshire Council are not meeting their requirement under paragraph 32 of the National Planning Policy Framework (NPPF) (2023) to prepare a Local Plan that is sound.
- 5.1.3. Per the NPPF, Plans are 'sound' if they are positively prepared, justified, effective; and consistent with national policy. The proposed Local Plan strategy is not positively prepared or justified.
- 5.1.4. This is due to a failure to comprehensively review and update the Sustainability Appraisal (SA) Site Assessments (ref: GC44), and subsequent failure to use current data to make justified conclusions on draft site allocations in the Sustainability Appraisal (GC44) and Housing and Employment Topic Paper (HETP) (ref: GC45).
- 5.1.5. In doing this, Shropshire has not planned a positive approach to accommodate the proposed contribution of 1,500 dwellings and 30ha of employment land towards the Black Country's unmet need, or their own housing requirement.
- 5.1.6. The Raby Estate's site at Beslow (ref: BWU001) lies in the Shrewsbury to Telford strategic growth corridor and the West Midlands strategic growth corridor, an area identified for economic investment.
- 5.1.7. The site is strategically located on the M54/A5 corridor to the Black Country, wholly outside of the Green Belt. This means Beslow is extremely well-placed to deliver new homes, employment and community uses which can meet Shropshire's (and the Black Country) economic and social needs and be of significance for the wider Midlands region.
- 5.1.8. Owing to the above, Beslow deserves more thorough consideration than was given in the SA's (GC44) site assessment process, which does not get to the heart of the site's opportunities.
- 5.1.9. Further there are concerns that the evidence base has not been updated with regards to the village of Cressage, as no consideration has been given to the fact that the draft allocation in the village has had a planning application refused on technical grounds for an insurmountable highways safety issue. The concern here is, therefore, that Cressage will not get the level of housing growth required over the plan period as the development would not be deliverable.
- 5.1.10. The Raby Estate's site, the Land at Shore Lane remains available for immediate delivery (subject to securing the relevant planning permissions), and is technically sound, with Shropshire Council confirming that there are no technical barriers to delivery. We recommend that the SA (and subsequently the draft Local Plan) is updated (as a Main Modification) to allocate the Land at Shore Lane to ensure that Cressage can grow in line with expectations over the plan period.
- 5.1.11. In short, the Estate has proposed a number of updates that are required to both the SA and the HETP to ensure that once adopted, the Local Plan is sound and based on accurate and appropriate



evidence, ensuring Shropshire can meet the levels of housing requirement required over the plan period.

- 5.1.12. Until the proposed updates have been made to the draft Local Plan, and its evidence base has been updated to consider all reasonable alternatives, the draft Plan cannot be considered sound as it is unjustified, not effective and hasn't been positively prepared. It is therefore inconsistent with Paragraph 35 of the NPPF and fails the tests of soundness.
- 5.1.13. We trust that our representations will be considered in the ongoing examination, and when Shropshire Council prepare their Main Modifications to the draft Local Plan. The Raby Estate is keen to engage with Shropshire Council wherever possible, and their sites remain ready to assist the Council to meet their housing need requirements.

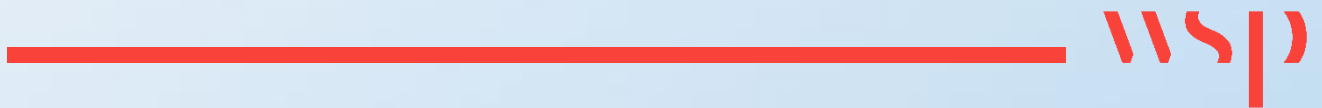


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Appendix A

INDICATIVE MASTERPLAN FOR BESLOW (BWU001)



Beslow Masterplan

The masterplan for Beslow was originally drawn up by URBED drawing upon the principles of David Rudlin's Wolfson Prize winning proposal for the fictional town of Uxchester. David is now with BDP who have taken on the role of master planner retaining the same principles. The Raby estate as a long term, responsible landowner is committed to promoting a new community in the spirit of the garden city, a place that supports a strong community, provides a full range of facilities and services, is zero carbon, beautifully designed and well connected by public transport to Telford and Shrewsbury.

The master plan proposes a new settlement of 3,500 homes with a population of around 7,000 and 64,000sqm of employment space supporting around 3,000 jobs. The plan includes junior school and secondary schools plus a traditional town centre full of shops and small businesses.

The master plan is illustrated on the following drawings, which seek to achieve these objectives and include the below principles:

- Illustrative Masterplan;
- Land Use Plan;
- Open Space Plan;
- Access and Road Hierarchy Plan; and
- Archaeology Plan.

1. A Real Town (Land use Plan)

Too often new settlements become little more than large housing estates dependent on car use and with few local facilities. Beslow is designed to be different. The master plan includes all the things that you would expect to find in a town with a population of around 7,000. It will include a traditional town centre, built around a town square and a clock tower on the top of a low hill. This will be surrounded by small shops (no supermarket) and other services to provide for the needs of the community. The mixed-use town centre will include space for other small business and workshop/office space is scattered through the rest of the plan.

Providing this space is not a design problem. It is easy enough to draw a real place on a plan, achieving it is an economic problem and goes to the heart of the proposals outlined in the Wolfson Garden City Prize which was focussed on economics. The key will be to use land value capture and to provide employment space at cost so that it can be occupied affordably by local businesses. The experience of the Duchy of Cornwall in Poundbury and Nansleden is that over the long term this approach produces a perfectly good financial return but it is very different to the way that most housebuilders operate.

2. A Petal Layout (Illustrative Plan)

The layout of the masterplan is based on an imaginary history of how the town might have developed. It is designed around a compact settlement core around the town centre. This is the imaginary original settlement that may have originally been a fortified burg. As was often the case when the settlement expanded beyond its walls, it leap-frogged a band of open

space to create a series of satellite suburbs each with their own distinctive identity. It is a structure that can be seen in many historic towns including Shrewsbury and gives a shape and structure to the plan. It also conforms to the principles of a sustainable walkable place with everywhere within 800m or a ten-minute walk of the centre.

3. A Garden Town (Open Space Plan)

The Uxcester offer was that for every hectare of land that was developed another hectare would be provided as publicly accessible open space. The Beslow new settlement proposals involve developing 90ha of land for new housing and other uses. The masterplan also includes 32ha of formal public open space, 9ha of school playing fields and 78ha of natural green space comfortably exceeding the Uxcester target.

The public open space is largely contained within a Stray, a ring of parks and spaces that encircle the town centre, separating it from its suburbs. This is inspired by the Stay in Harrogate and will include space for play, sport and informal recreation. The plan retains all exist woodland on the site and has been designed to retain all of the mature trees and as many of the hedgerows as possible. The stray will link all of these natural features creating wildlife corridors and enhancing biodiversity.

4. A Connected Town (Street Hierarchy Plan)

The master plan has been designed to create a connected settlement that reduces car use and promotes active travel and public transport. There are two elements to this; achieving an element of self-containment so that the population can meet many of their needs locally and ensuring that for all trips there is an alternative to using a private car.

The self-containment will create a place where people can do their shopping, access local services attend school locally. The compact nature of the settlements means that all of these things will be within a 5-10 minute walk or an even shorter journey by bike. Employment will also be provided locally giving people the option of working or running a business within a short distance of their home.

Of course it will never be possible to create a self-contained settlement. People will still need to travel into Shrewsbury and Telford or further afield to access higher order services and retailing. Beslow will incorporate a regular Bus Rapid Transit (BRT) route to Shrewsbury and Telford as well as providing community car-pooling and car sharing via a transport as a service app. All properties will also be provided with electric car charging points.

5. Sitting Comfortably Within the Landscape

The plan has been designed not to be invisible, but to sit comfortably within the landscape. The town centre is located on top of a shallow hill with a clock tower at the highest point as a landmark. However the plan has also been designed with the topography so that the settlement will not be visible at all from Wroxeter or from the villages of Uppington or Donnington.

6. Respecting Archeology (Archaeology Plan)

It is recognised that this is an important landscape with archaeological remains associated with Wroxeter as well as later medieval settlements. The Roman town site a little way to the west of the proposed settlement and includes the remains of the town plus a wider area that was once within the town wall. The Beslow site includes elements associated with the environs of the town such as the route of an aqueduct, the roman road and other landscape features that may be roman. There are also later medieval remains and settlements. All of these have been assessed by the team's archaeologist and the settlement has been designed to avoid all sites with potential archaeological significance.

7. Zero Carbon

The new settlement also includes a commitment to be zero carbon. This will be implemented through a leasehold condition on developers to require them to make their homes energy efficient to provide heating without using fossil fuels and to incorporate renewable power generation on all roofs. This will link to the transport system and electric vehicles as well as recycling and drainage.

8. Community Controlled

The estate's commitment is to retain a long-term land interest in the site and to manage the new community in partnership with the growing community as it develops. A community trust will be established that will be vested with local facilities and open spaces and provided with an income to cover management costs. This will be linked to a digital twin of the settlement to allow for the community to organise and access services online.

Appendix B

BESLOW HIGHWAYS AND TRANSPORT MASTERPLAN STRATEGY





Raby Estate

Beslow New Settlement Highways and Transport Masterplan Strategy

June 2024



Raby Estate

Beslow New Settlement

Highways and Transport Masterplan Strategy

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APPENDICES

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Raby Estate

Beslow New Settlement

Highways and Transport Masterplan Strategy



APPENDIX A Site Access Drawing

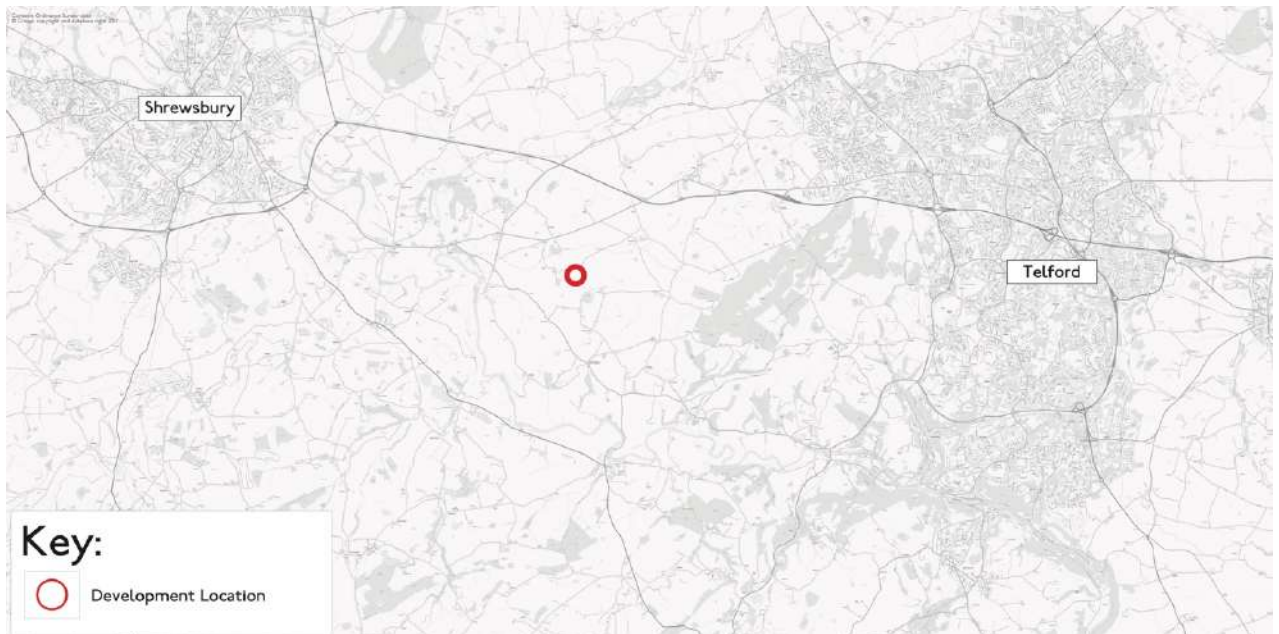
1. Introduction

1.1 Preamble

1.1.1 Mode Transport Planning ('Mode') has been appointed by Raby Estate to prepare a Highways and Transport Strategy for a potential strategic residential-led development site on land within the Beslow area of the Raby Estate in Shropshire (referred to herein as 'the site').

1.1.2 The development site location is shown in [Figure 1.1](#).

Figure 1.1 : Development Site Location – Raby Estate (Beslow)



1.1.3 The site is located 10km to the east of Shrewsbury and 12km to the west of Telford. The site abuts Roman Road (B5061) and the Horseshoe Inn to the north, with open agricultural fields to the east and west. To the south, the site boundary abuts the B4380 and the hamlet of Donnington.

1.1.4 The proposals for a new settlement include circa 3,500 new homes, a primary school, secondary school, a local centre and an employment use across the development. A primary access will be created from the B5061 and a secondary from the B4380, enabling provision of a public transport connection through the site. An illustrative masterplan is shown in [Figure 1.2](#).

Figure 1.2 : Illustrative Masterplan



1.2 Methodology

- 1.2.1 The methodology of the strategy adopts the guidance set out within the Ministry of House, Communities & Local Government's 'Transport Evidence Bases in Plan Making and Decision Taking' (2014), which provides guidance to help local planning authorities assess strategic transport needs in Local Plan making.
- 1.2.2 To further inform the Transport and Highways Strategy, Mode requested meetings with the Local Highway Authority, Shropshire County Council (SCC) and Strategic Highway Authority, National Highways.
- 1.2.3 Mode met with National Highways (Highways England at the time of meeting) and their Term Consultants, AECOM, on 25th July 2019.
- 1.2.4 This Transport and Highways Strategy considers the transport opportunities provided by the proposed development at this location, including access by sustainable modes and vehicular access junction arrangements, seeking to address the highways comments raised in the Sustainability Appraisal.

1.3 Report Structure

1.3.1 Following this introduction, the Transport and Highways Strategy has been structured as follows:

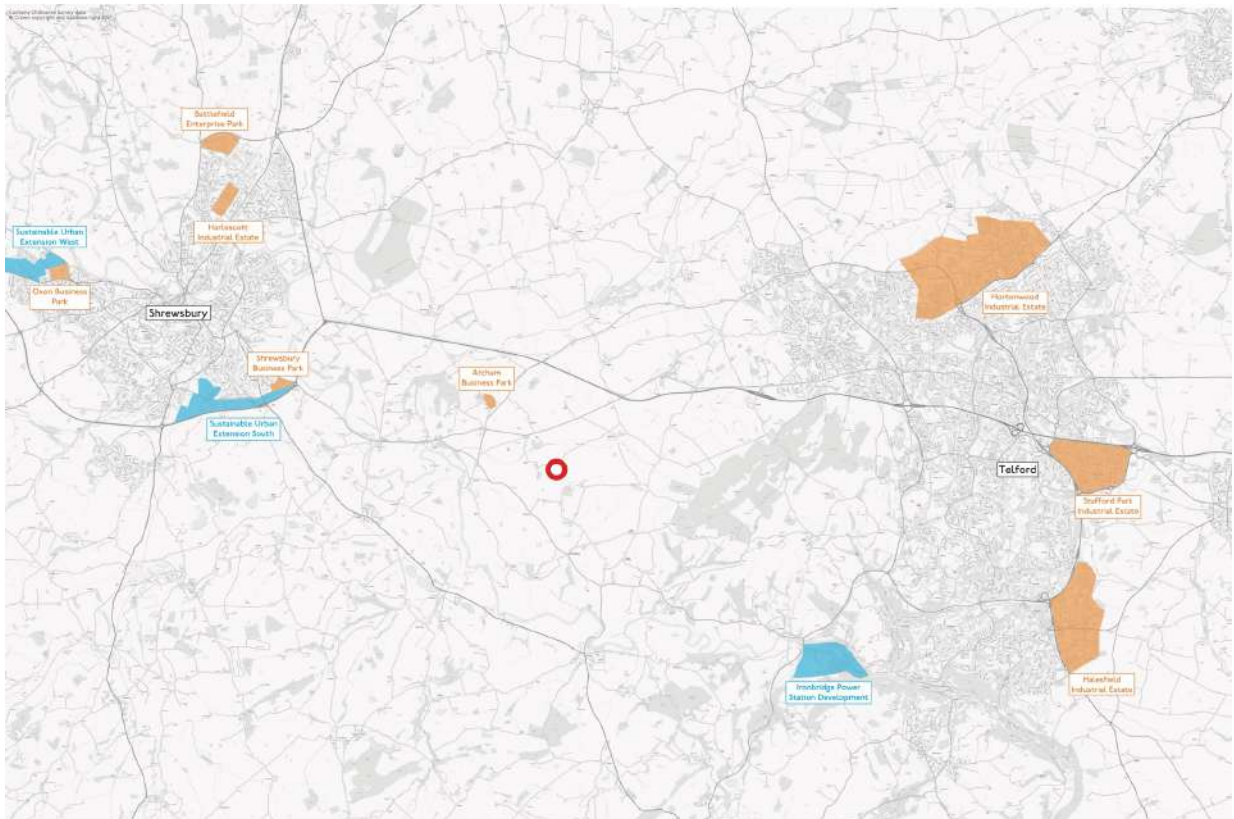
- Chapter 2 describes the site location, local highway network and accessibility by all modes;
- Chapter 3 outlines emerging infrastructure and funding;
- Chapter 4 details the proposed vehicular access arrangement;
- Chapter 5 details the sustainable transport proposals;
- Chapter 6 details an indicative phasing strategy; and
- Chapter 7 provides the summary of the report.

2. Existing Conditions

2.1 Local Context

- 2.1.1 The site is located 10km to the east of Shrewsbury and 12km to the west of Telford with good highway connections to both.
- 2.1.2 **Figure 2.1** shows the location of the site in strategic terms, in relation access to employment and connections to proposed development sites in the local plan.

Figure 2.1 : Strategic Location



- 2.1.3 The proposed site location benefits from its proximity to both Shrewsbury and Telford with links to the Strategic Road Network providing access to both.
- 2.1.4 Connections to Shrewsbury join the A5, which forms part of the Shrewsbury Ring Road, to the southeast at Emstrey Roundabout. Shrewsbury Business Park and the proposed Sustainable Urban Extension South are located adjacent to the Emstrey Roundabout.
- 2.1.5 The A5 provides further connections to the employment areas of Battlefield Enterprise Park, Harlescott Industrial Estate, Oxon Business Park and the Proposed Sustainable Urban Extension West without traffic entering Shrewsbury Town Centre.

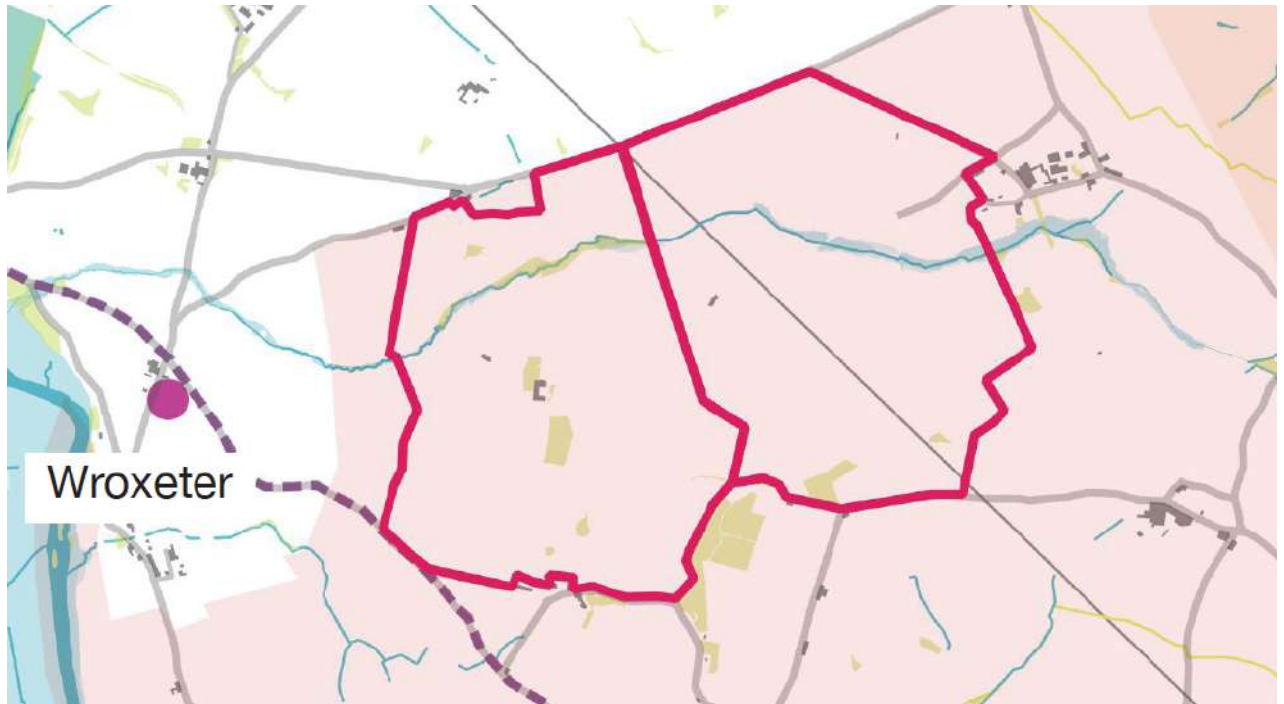
- 2.1.6 Telford and the surrounding employment parks can be accessed from Junction 7 of the M54.
- 2.1.7 To the south of the site the proposed mixed-use development site at the Former Ironbridge Power Station can be access via the B4380.
- 2.1.8 [Table 2.1](#) shows indicative travel times from the proposed sites to the areas identified.

Table 2.1 : Indicative Journey Times to Key Destinations

Destination	Journey Time
Shrewsbury	16 mins
Telford	13 mins
Atcham Business Park	2 mins
Shrewsbury Business Park	8 mins
Sustainable Urban Extension South	9 mins
Sustainable Urban Extension West	16 mins
Oxon Business Park	18 mins
Battlefield Enterprise Park	16 mins
Harlescott Industrial Estate	18 mins
Hortonwood Industrial Estate	19 mins
Stafford Park Industrial Estate	13 mins
Halesfield Industrial Estate	18 mins
Proposed Ironbridge Power Station Development	10 mins

- 2.1.9 The site comprises adjoining parcels of land which are currently predominately used for agricultural and farming purposes. The site also includes a limited number of properties which are all under the control of Raby Estate. The total area of the site is approximately 262 hectares, as shown [Figure 2.2](#).

Figure 2.2 : Development Site – Raby Estate (Beslow)



2.2 Local Highway Network

2.2.1 The site is bounded by the local highway network to the north and south. At the northern boundary, the site abuts Roman Road (B5061) and an unnamed minor road. The southern site boundary abuts the B4380 and an unnamed road that routes through Donnington.

2.2.2 Figure 2.3 highlights the key roads in the vicinity of the Estate.

Figure 2.3 : Existing Local Highway Network (image source: Google Earth)



Roman Road (B5061)

- 2.2.3 Roman Road comprises a c.7.0m wide two-way single carriageway with one lane in each direction. The road extends in a broadly east-west alignment and is subject to the national speed limit.
- 2.2.4 Adjacent to the site, the road comprises an elevated section of carriageway with earth embankments either side, as shown in [Photograph 2.1](#).

Photograph 2.1 : Roman Road (B5061) - Eastbound



2.2.5 Near the Horseshoe Inn, Roman Road forms the major arms of a priority junction with an unnamed road. Near this junction, the alignment of Roman Road changes, with solid white centre lines provided at this location, as shown in [Photograph 2.2](#).

Photograph 2.2 : Roman Road (B5061) – Westbound



2.2.6 From this point, Roman Road continues to the west for approximately 1km before forming a cross-roads junction with the B4394, as shown in [Photograph 2.3](#).

Photograph 2.3 : Roman Road (B5061)/ B4394 Junction - Westbound



- 2.2.7 There is no existing footway infrastructure or street lighting columns on Roman Road (B5061) in the vicinity of the site.
- 2.2.8 The unnamed road by the Horseshoe Inn extends on a southwest to northeast alignment, linking Roman Road and the B4394. The unnamed road comprises a single carriageway with one lane in each direction for the first 60m, extending as a single-track road beyond this point. Vehicular access to the Horseshoe Inn and a small number of properties is provided via the road.
- 2.2.9 Approximately 2km to the east of the site, Roman Road passes beneath the A5, before continuing via Overley and intersecting with Holyhead Road (B5061) further to the east. Approximately 175m to the south of this junction, Holyhead Road (B5061) provides access to the M54 motorway at Junction 7 (eastbound) and A5 (westbound), via unsignalised on/off slip roads.

B4380

- 2.2.10 Adjacent to the site boundary, the B4380 comprises a c.5.5m wide two-way single carriageway with one lane in each direction, as shown in [Photograph 2.4](#).
- 2.2.11 Locally, the B4380 provides links to the villages of Leighton and Cressage located 5km to the southeast. The B4380 connects via priority junction with the B5061 approximately 2.5km to the northwest.
- 2.2.12 The road is subject to the national speed limit and there is no existing footway infrastructure or street lighting columns in the vicinity of the site. The road is bound by grass verges and hedgerow on both sides.

Photograph 2.4 : B4380 - Southbound



A5

2.2.13 The A5 forms part of Highway England's Strategic Road Network providing a high-capacity link to the wider Strategic Road Network. In the vicinity of the site, the A5 comprises a dual-carriageway with two lanes in each direction, as shown in in [Photograph 2.5](#).

Photograph 2.5 : A5 – Westbound (source: Google Maps)



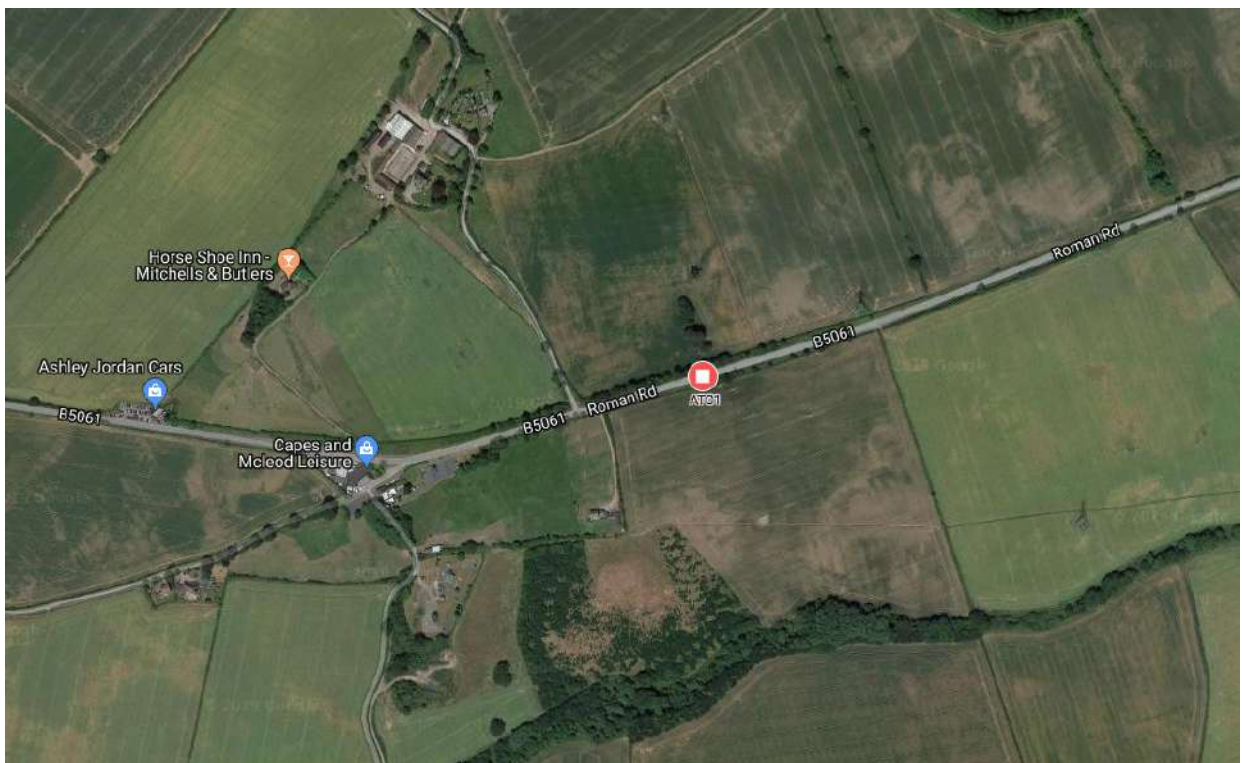
2.2.14 To the west, the A5 provides a circulatory route to the south of Shrewsbury, connecting to local radial routes providing access to the town centre. To the east, the road connects with the M54 Motorway at Junction 7.

2.2.15 The A5, as well of the M54, are accessible via Roman Road and Holyhead Road (B5061) approximately 6km to the east of the site. To the west, the A5 is accessible via a 7km route on the B5061 and B4380, leading to the Emstrey Island signalised roundabout.

2.3 Existing Traffic Flow and Speeds

2.3.1 In order to establish current traffic flows and 85th percentile speeds on the local highway network, an Automatic Traffic Counter (ATC) was placed on Roman Road, adjacent to the northern site boundary, as shown in Figure 2.4.

Figure 2.4 : ATC Location – Roman Road (image source: Google Earth)



2.3.2 The ATC recorded traffic speeds and two-way traffic flow over a 7-day period between Thursday 6th June and Wednesday 12th June 2019.

2.3.3 A summary of the recorded traffic flows is shown in Figure 2.5.

Figure 2.5 : Existing Traffic Flows – Roman Road (image source: Google Maps)



2.3.4 The average recorded 85th percentile speeds across the week are shown in Table 2.2.

Table 2.2 : 85th Percentile Speeds – Roman Road (B5061)

	Eastbound	Westbound
Speed (mph)	62.9	62.2

2.3.5 The 85th percentile traffic speed data, summarised in Table 2.2, shows that vehicles on Roman Road (B5061) currently travel at 62.9mph in the eastbound direction and 62.2mph westbound direction, which is marginally above the speed limit for the road.

2.4 Existing Mode Share

2.4.1 To establish the existing mode share of people living in the area, ‘Method of Travel to Work’ data has been obtained from the 2011 census. The census data applies specifically to the ‘Shropshire 028’ Middle Super Output Area (MSOA), which includes the Raby Estate land being considered in this assessment and details the main mode of travel for commuting trips.

2.4.2 The ‘Method of Travel to Work’ data provides a reasonably accurate estimation of the proportion of trips by each mode for people living in the area. The 2011 census data for ‘Shropshire 028’ is summarised in Table 2.3.

Table 2.3 : Method of Travel to Work – Modal Split (Shropshire 028 MSOA)

Method of travel to work	Modal Split
Car/Van Driver	84%
Train	1%
On Foot	5%
Passenger in Car/Van	5%
Bicycle	2%
Bus, Minibus or Coach	2%
Motorcycle	1%
Taxi	0%
Total	100%

2.4.3 As shown in **Table 2.3**, the 2011 census data indicates that 89% of residents travel to work by car or van, with 84% driving and 5% as a passenger. The modal split data shows that 1% travel by train, 5% travel on foot, 2% travel by bicycle and 2% travel by bus.

2.4.4 As anticipated, the model split data indicates a relatively high proportion of trip by car and low proportion of trips by sustainable modes, which is common for rural locations where there is a reliance on car travel primarily due to the remoteness of the area and limited access to public transport provision.

2.4.5 The modal proportion of car travel is considered particularly robust when applied to a proposed development of around 3,500 new homes with local centre and amenities, when there is expected to be a reasonable number of internal trips that would not impact on the wider highway network.

2.5 Existing Sustainable Accessibility

2.5.1 The rural nature of the site means that accessibility by sustainable modes of travel is limited. This is reflected in the 2011 census data for the area, detailed previously, which shows that only 10% of employment trips are undertaken using sustainable modes of travel, with the majority of trips (84%) being by private car.

2.5.2 Due to the remoteness of the area, limited local amenities and lack of designated footway provision, opportunities to walk in the area are relatively limited. That said, it should be noted that existing sustainable travel opportunities do exist, albeit proportionate to the patronage levels typically experienced in relatively isolated rural locations.

Public Transport Services

2.5.3 Existing opportunities for sustainable travel include local bus services that route at the periphery of the site. There are further bus services operating in the local area that, although not routed at the periphery of the sites, could in theory be adapted to service a settlement of this scale.

2.5.4 The existing bus services, both at the immediate periphery of the site and within the local area, are indicatively shown in [Figure 2.6](#) and the timetables are summarised in [Table 2.4](#).

Figure 2.6 : Existing Local Bus Routes

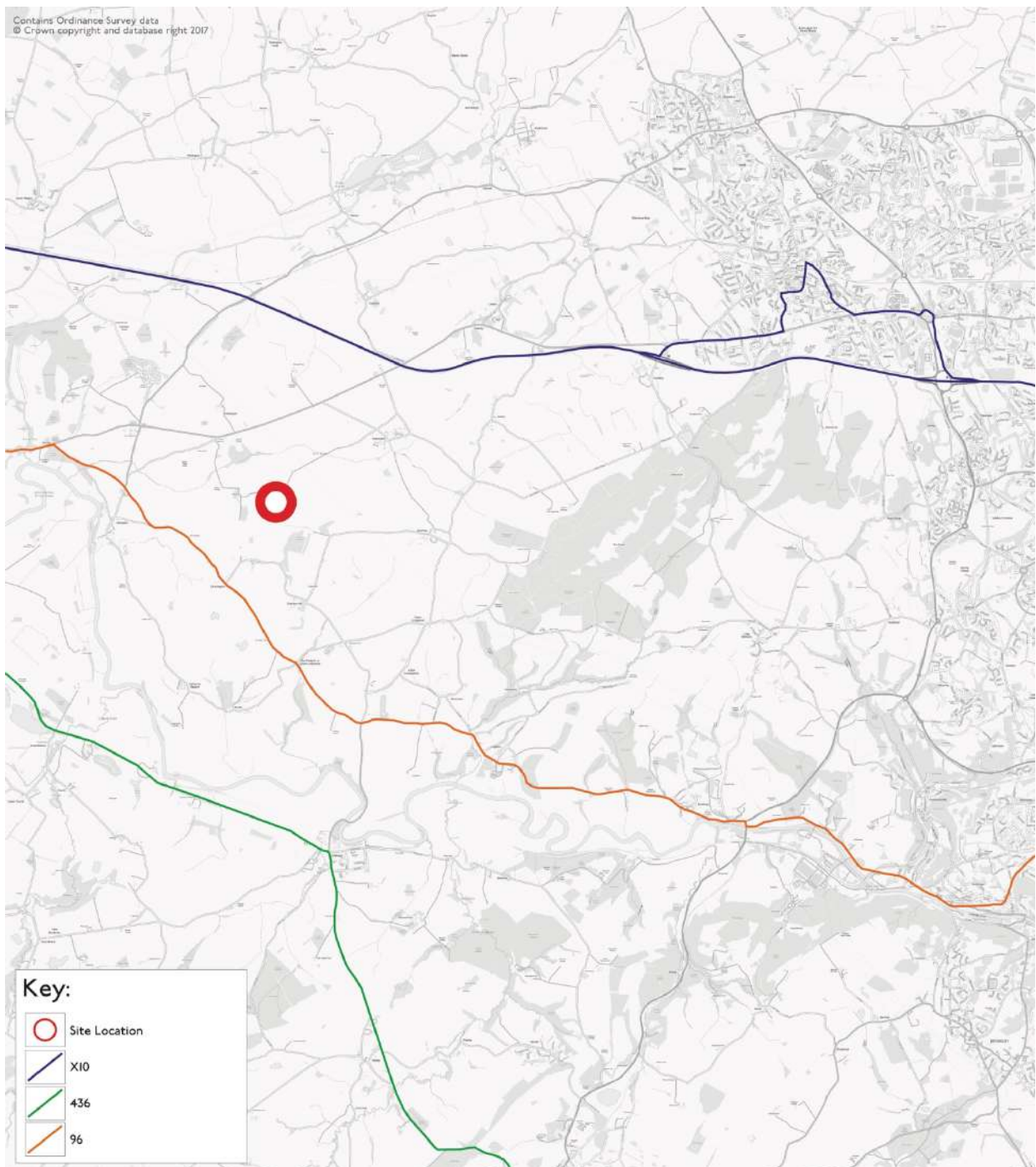


Table 2.4 : Local Bus Services

Service No.	Route	Approx. Two-Way Frequency (buses / hour)				
		AM	Off-Peak	PM	Sat	Sun
X10	Shrewsbury - Telford	1	1	1	1	1
436 / 436A	Shrewsbury - Bridgnorth	1	1	1	1	1
96 / 96A	Shrewsbury - Telford	<1	<1	<1	<1	No Service

2.5.5 Bus service 96/96A is routed along the B4380 which abuts the site's southern boundary and provides a direct service to Shrewsbury Bus Station and Telford Bus Station. From the either bus station, Shrewsbury Railway Station and Telford Railway Station is accessible within a reasonable walking distance.

2.5.6 Existing bus stops, including bus layby, shelter and flagpole, are currently provided on Roman Road (B5061) at either side of the crossroad junction B4394, as shown in [Photograph 2.6](#). This would indicate that, historically, there has previously been a regular bus service operating on Roman Road along the site's northern boundary.

Photograph 2.6 : Existing Bus Stops on Roman Road (B5061) - eastbound



2.5.7 A summary of direct train services available from the railway stations is shown in in [Table 2.5](#).

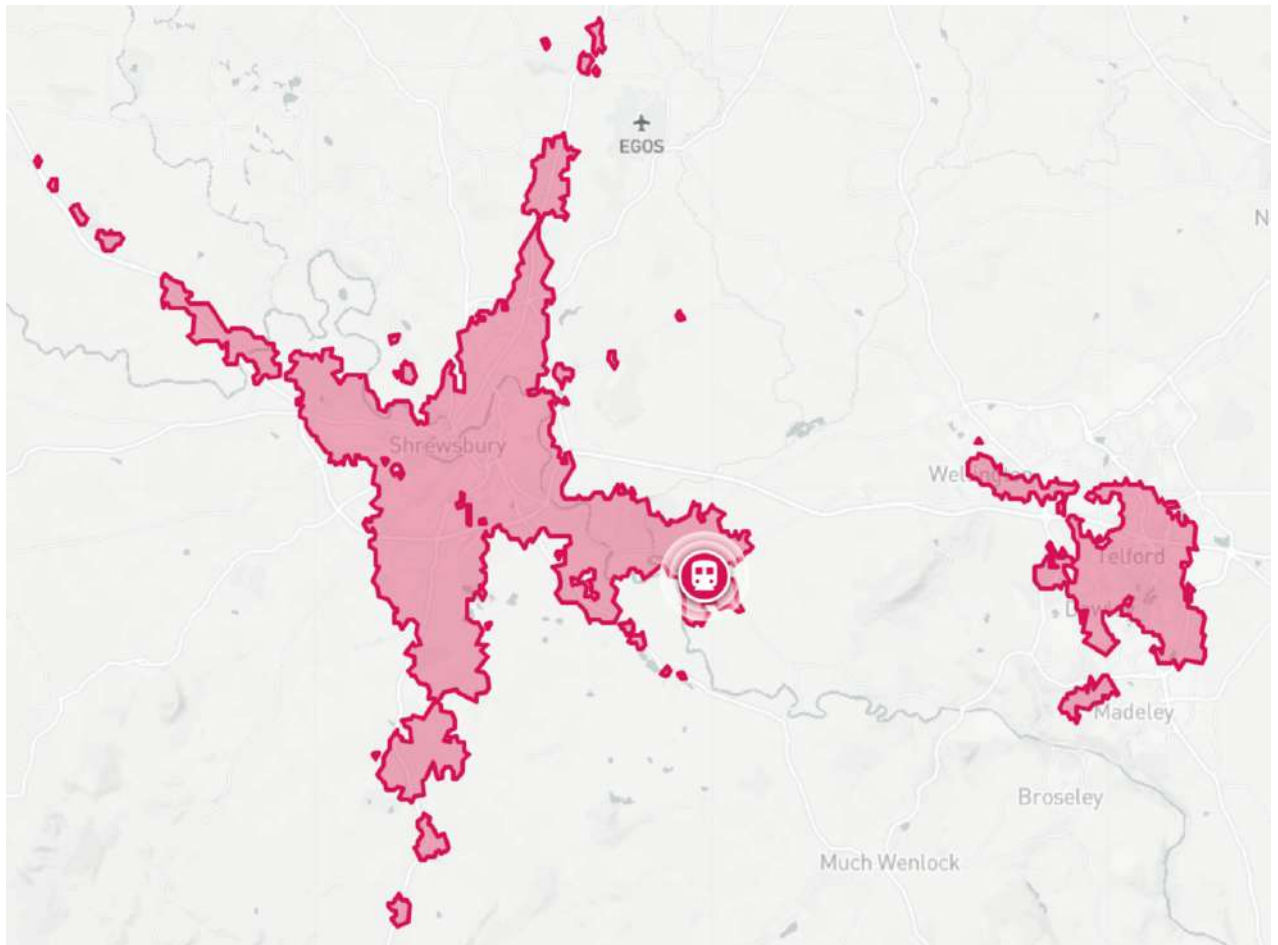
Table 2.5 : Rail Services from Shrewsbury and Telford Railway Stations

Destination	Approx. Frequency	Approx. Journey Time
Aberystwyth	1 service/ hour	1 hour 50 minutes
Birmingham International	1 service/ hour	1 hour 20 minutes
Birmingham New Street	1-2 services/ hour	1 hour 10 minutes
Cardiff Central	1 service/ hour	2 hours
Carmarthen	1 service/ 2 hours	4 hours
Crewe	1 service/ 2 hours	50 minutes
Holyhead	1 service/ hour	3 hours
Llandrindod	1 service/ 3 hours	1 hour 30 minutes
Manchester Piccadilly	1 service/ hour	1 hour 25 minutes
Pwllheli	1 service/ 2-3 hours	2 hours 50 minutes

2.5.8 **Table 2.5** shows that a wide range of rail services are available from Shrewsbury Railway Station and Telford Railway Station direct to major towns and cities across the region.

2.5.9 **Figure 2.7** shows the area accessible by public transport within 1 hour from the centre of the site.

Figure 2.7 : Public Transport Accessibility



Cycling

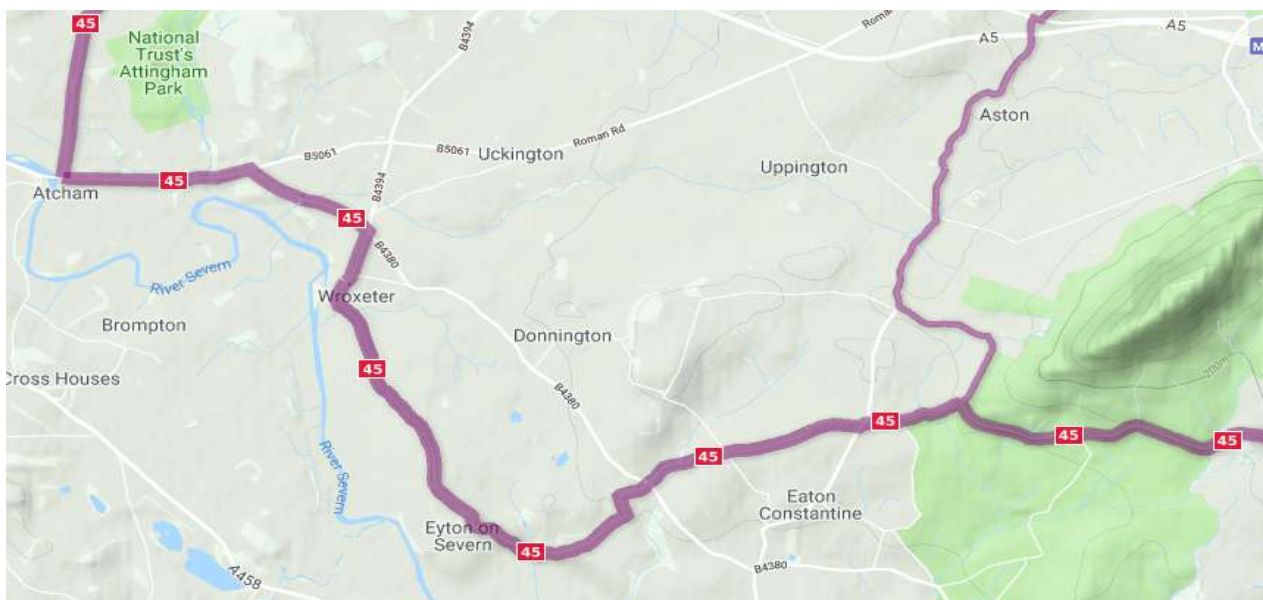
- 2.5.10 In respect of acceptable cycle distances, “Local Transport Note 2/08: Cycling Infrastructure Design”, published by DfT, states that many utility cycle trips are less than three miles (approximately 5 km), but for commuter journeys a distance of over five miles (approximately 8 km) is not uncommon.
- 2.5.11 With Shrewsbury and Telford both being located over 10km from the Site, cycling will not be a realistic option for novice cyclists; however, for more experienced cyclists these destinations would be achievable for commuting and leisure trips, as shown in [Photograph 2.7](#).

Photograph 2.7 : Cyclist on Roman Road (B5061) - Westbound



2.5.12 That said, in accordance with local transport policy, cycling would be an option for many people internally within the site, facilitated by the provision of accessible local amenities and highway infrastructure. In the wider area, National Cycle Route 45 passes within close proximity the site, as shown in Figure 2.8.

Figure 2.8 : National and Local Cycle Routes (source: sustrans.org.uk)



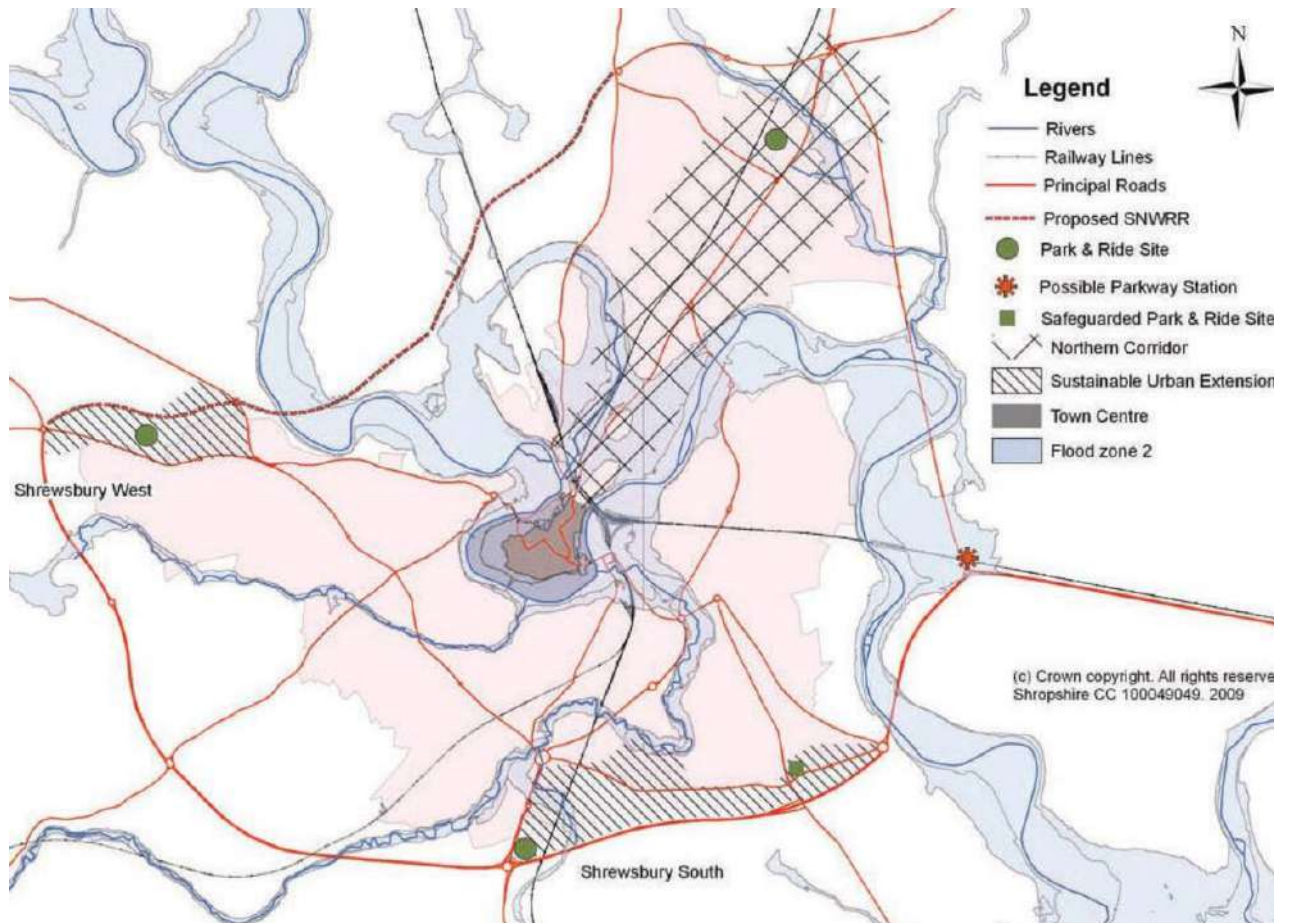
3. Emerging Infrastructure

3.1 Shrewsbury West Sustainable Urban Extension (SUE)

3.1.1 Identified in the adopted core strategy, the Shrewsbury West Sustainable Urban Extension (SUE) will help meet the towns future housing and employment needs. The SUE will include the provision of approximately 750 new homes, together with up to 12 hectares of employment land, a new Oxon Link Road (OLR) between the A5 bypass and Holyhead Road and a new expanded local centre.

3.1.2 The OLR is included in the Marches LEP’s £75 million Growth Deal and secured planning permission in October 2023. Figure 3.1 shows the Shrewsbury Core Strategy Key Diagram

Figure 3.1 : Shrewsbury Core Strategy Key Diagram



3.1.3 As shown in Figure 3.1, the OLR will be located to the west of Shrewsbury Town Centre and will connect with the proposed Shrewsbury North West Relief Road (NWRR). The OLR has been designed to a standard to function as a component of the Shrewsbury North West Relief Road (NWRR).

3.1.4 It is proposed that the OLR will be limited to 50mph, with a 3.5m wide cycleway linking with the existing National Cycle Route on Holyhead Road. The OLR is intended to be a high quality and attractive strategic route for east to west movements between the A5 and the town centre. The benefits anticipated by the OLR are as follows:

- Improvement of the capacity at the A5 Churncote Island Junction;
- Introduction of traffic management, alternative transport modes and environmental enhancement measures;
- Provide access to the Park and Ride facility and Shrewsbury Town Centre;
- To design development areas around a clear hierarchy of traffic routes supplemented by a good network of footpath and cycle links, to provide connectivity, and to embed the encouragement of smarter travel choices from the outset; and
- A strategy for modal shift from private car use to more sustainable modes of transport and movement will be implemented.

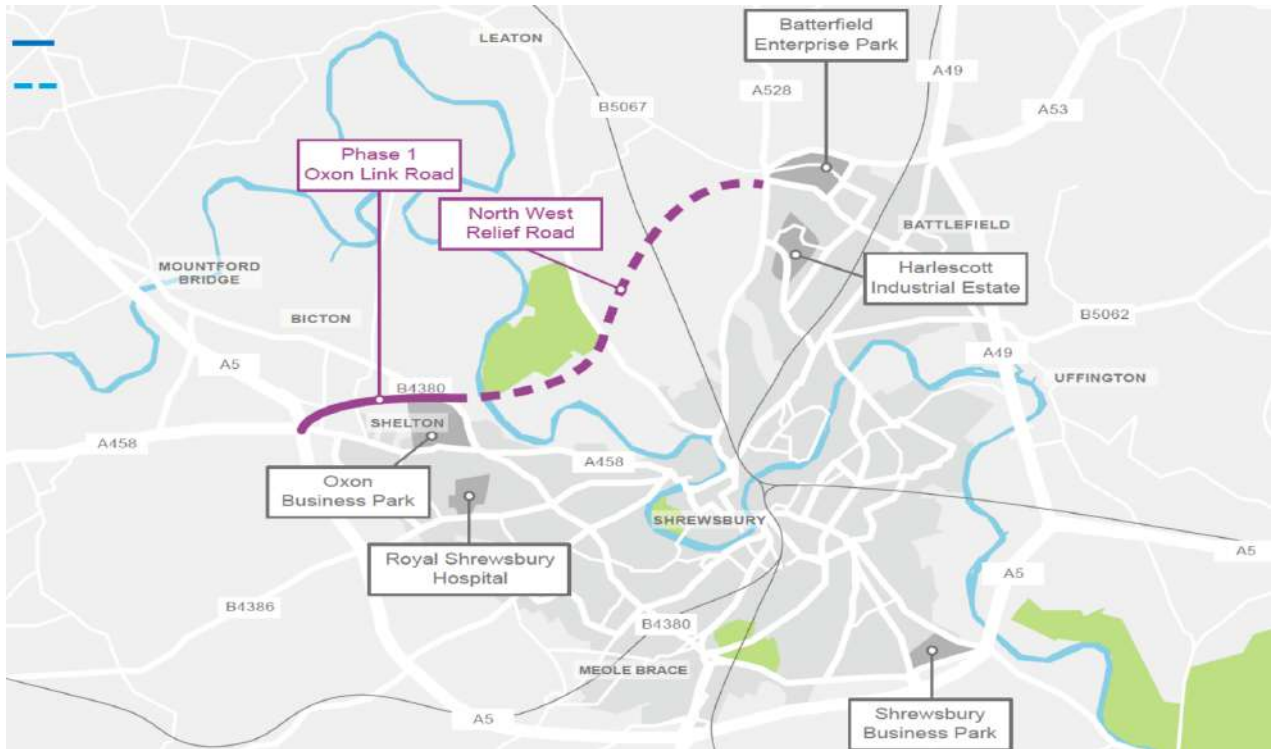
3.2 Shrewsbury North West Relief Road (NWRR)

3.2.1 In October 2023 Shropshire Council gained planning approval for the Shrewsbury North West Relief Road (NWRR). The extent of the NWRR is shown in [Figure 3.2](#).

3.2.2 The NWRR will provide a new single carriageway road linking the northern and western parts of Shrewsbury, connecting with existing roads with new roundabouts. To the west the NWRR will connect with the planned Oxon Link Road (OLR). The key features of the scheme are summarised below:

- The NWRR will be a 7.3m single carriageway all-purpose road with 1.0m margins and at-grade junctions;
- The NWRR will be bounded on both sides by open space and will include a shared footway / cycleway on its southern side;
- The NWRR will have a speed limit of 60 mph; and
- Bridges and at-grade crossings will be provided for pedestrians and cyclists to maintain connectivity and ensure safety.

Figure 3.2 : The Shrewsbury North West Relief Road (NWRR)



3.2.3 The NWRR will provide a new, high standard, direct route between the north and west of Shrewsbury, offering time savings for road users. It is intended that a peak hour journey from the A5 Churncote to A49 Battlefield would take about 6 minutes using the NWRR instead of about 20 minutes or 15 minutes using existing routes. Traffic will therefore transfer from the existing routes, reducing congestion. These benefits will be felt over a wide area, including the outer bypasses and rural lanes, as well as the roads leading into and through the town centre.

3.2.4 The expected benefits of the NWRR are as follows:

- Traffic will reduce on the western and northern approaches to the town centre, and on the Smithfield Road route through the town centre;
- Traffic will reduce on the rural lanes to the north-west of Shrewsbury (the rat run routes);
- Traffic will reduce on most sections of the A5 and A49 outer bypasses; and
- Traffic will reduce on several sections of the distributor ring road.

3.2.5 The modelling shows that at in the vicinity of the B3480 the A5 will see a reduction in traffic flows of up to 13% in the AM and PM peaks.

3.2.6 The reduction in traffic to the southeast of Shrewsbury will free up capacity along the A5 corridor for future development trips.

3.3 Shrewsbury Moves Proposals

- 3.3.1 Shrewsbury Moves is a 10-year vision and plan which presents the Movement and Public Space Strategy for the town.
- 3.3.2 The strategy has been put together by the Shrewsbury Big Town Plan Partnership, which is collectively made up of Shropshire Council, Shrewsbury Town Council and Shrewsbury BID.
- 3.3.3 The plan is designed to prioritise pedestrians, cyclists, and public transport above private motor vehicles, aiming to make the town a better place to live, visit, and conduct business.
- 3.3.4 The key themes of the strategy are:
- **Traffic Management & active travel inside the river loop** - Shifting the focus from private motor vehicle to sustainable, active transport modes.
 - **Traffic Management and active travel outside the river loop** - Encouraging walking, cycling and public transport for local trips across the town.
 - **Public Transport and Micromobility** - Establishing a comprehensive network of public transport and micromobility options across Shrewsbury.
 - **Parking Plus** - Remodelling parking charges within Shrewsbury to make sustainable alternatives more cost effective.
- 3.3.5 With Shrewsbury being one of the key destinations for employment trips from the Beslow Site, the proposed plan will complement the proposed sustainable transport improvements to support the development and will help to encourage low car use from the site.
- 3.3.6 Provision of a two-way bus corridor across the town centre and introduction of a high frequency bus corridor along the A5064 to Emstrey Roundabout will improve bus efficiency and journey times making bus travel from the site more attractive. There is also potential to provide connectivity to further locations with buses connecting across the town centre.
- 3.3.7 The introduction of a graduated system of parking charges will make parking in the town centre less desirable for future residents. Parking at the edge of town and then travelling by bus will be a cheaper alternative however this will require two modes of travel and with a good frequency bus service from the site, it is likely that residents will chose to make the full journey by bus.
- 3.3.8 The introduction of a Parkway Station to the east of Shrewsbury will provide future residents with access to the regional rail network, without the need to travel into Shrewsbury town centre. This connection to the rail network in close proximity to the site will enable the site to support sustainable travel and access to employment across the West Midlands Region.

3.3.9 Whilst proposals for a new Park and Ride facility off London Road, adjacent to Emstrey Roundabout, have been removed from the latest plan. There is potential that this could still be provided in the medium term whilst the Parkway Station is constructed and could benefit from the improved bus provision that is proposed to serve the site.

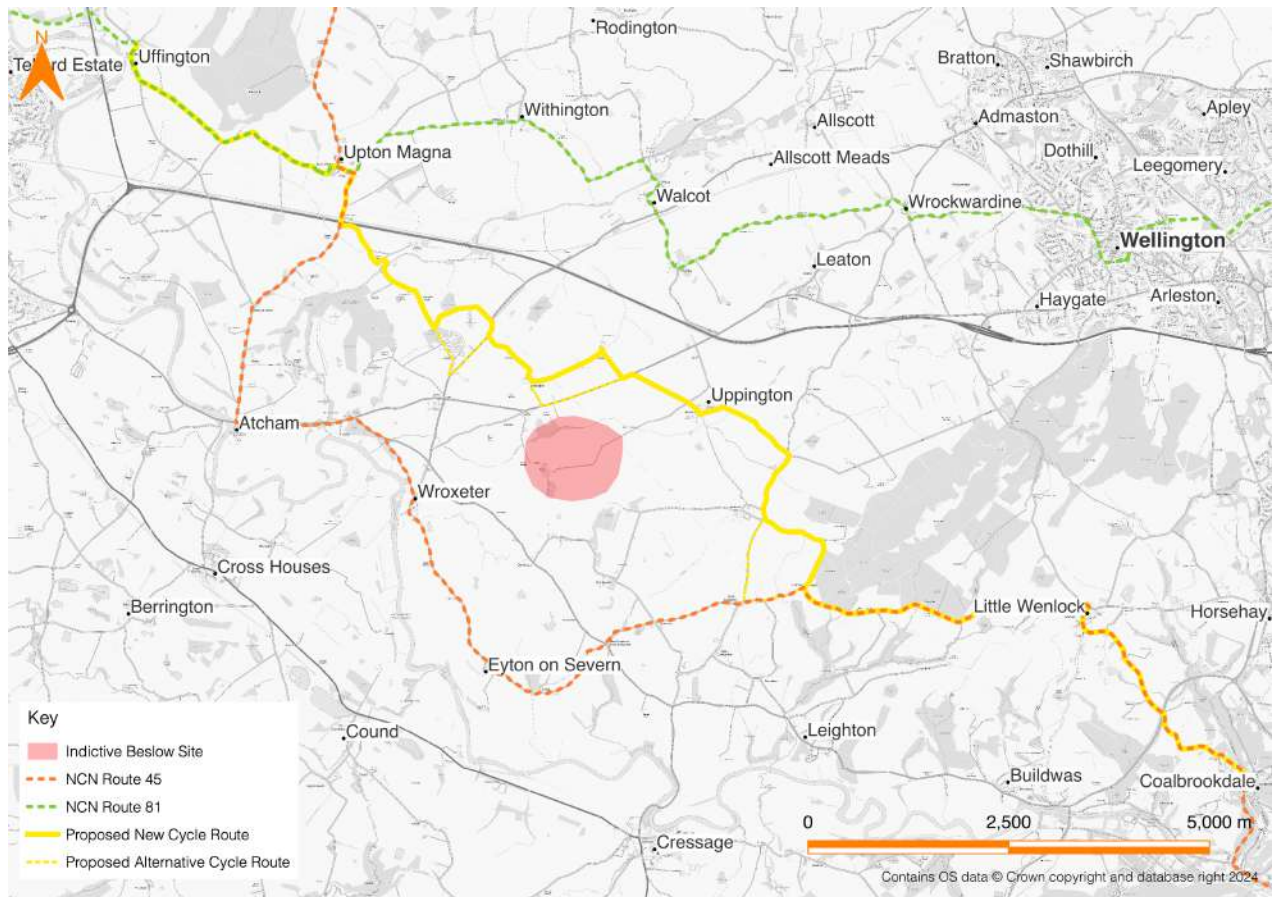
3.4 Shrewsbury to Wrekin Active Travel Route

3.4.1 A feasibility study has been undertaken by Sustrans regarding a potential new walking and cycling route between Shrewsbury and Coalbrookdale.

3.4.2 Sections of the existing National Cycle Network (NCN) in the area, which includes NCN Routes 45 and 81, have been classified as unsuitable for all users (red), and therefore are not suitable for all users, due to speeds and volumes of traffic.

3.4.3 The potential new route is shown in Figure 3.3, alongside the existing NCN in the area.

Figure 3.3 : Proposed New Shrewsbury – Wrekin Active Travel Route



3.4.4 As shown in Figure 3.3, the proposed route will utilise existing sections of the NCN where appropriate, as well as existing roads, Public Rights of Way and farmland tracks. The new route will follow the NCN design principles, as well as LTN 1/20.

3.4.5 A section of the proposed route (an alternative route) will run along Roman Road across the proposed site access location, from Uckington Farm. If provided, this active travel route could be linked to the proposed cycle routes within the Beslow development, enhancing pedestrian and cycle connectivity to the local area.

4. Vehicular Access Strategy

4.1 Overview

4.1.1 This chapter presents the strategy for achieving vehicular access to the strategic site from the Local Highway Network.

4.2 Access Strategy

4.2.1 In accordance with the feasibility masterplan prepared by URBED, on behalf of Raby Estate, the site would benefit from two points of access including Roman Road (B5061) to the north and the B4380 to the south.

4.2.2 The primary access will be from Roman Road with the southern route forming a secondary access.

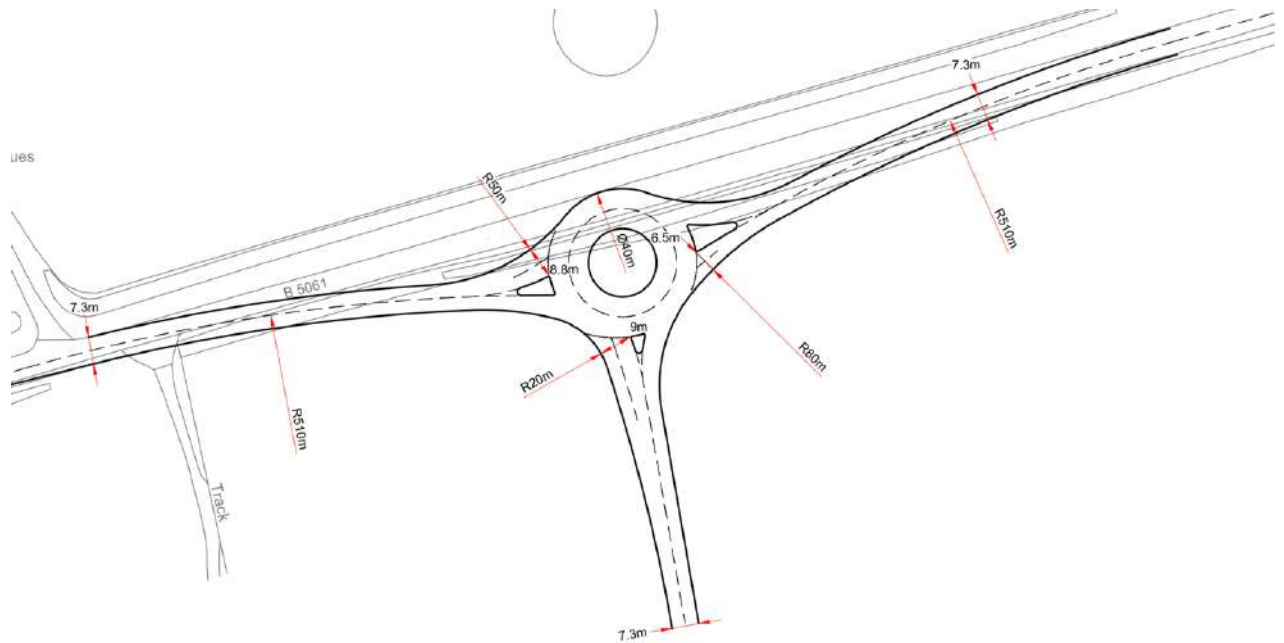
4.3 Roman Road Primary Access

4.3.1 In order to accommodate the scale of development, a number of access options from Roman Road have been considered with a roundabout junction being deemed the most appropriate.

4.3.2 An indicative roundabout access design has been prepared in accordance with Design Manual for Roads and Bridges (DMRB) standards. The roundabout junction can be delivered on land within the ownership of Raby Estate and the adopted highway.

4.3.3 **Figure 4.1** shows the indicative roundabout access layout. The full indicative design is presented in **Drawing No. J32-4128-PS-001** attached in **Appendix A**.

Figure 4.1 : Roman Road Site Access



4.4 B4380 Secondary Access

- 4.4.1 The secondary access will be formed by a simple priority junction with the B4380 designed in accordance with DMRB and Manual for Streets (MfS).
- 4.4.2 The location of the secondary access shown on the indicative masterplan has been identified to ensure that suitable forward visibility of 215m can be achieved in both directions considering the horizon and vertical alignment of the B4380.
- 4.4.3 The access will be of a suitable size to enable bus movements into and out of the proposed development.

4.5 Internal Layout

- 4.5.1 The internal road network will be designed in accordance with local and national policy, which includes the following documents:
 - SCC's Residential Design Guide
 - LTN 1/20 Cycle Infrastructure Design;
 - Design Manual for Roads and Bridges;
 - Manual for Streets; and
 - Manual for Streets 2.
- 4.5.2 An initial review of the internal road hierarchy for the indicative masterplan identifies 3 key routes within the site.

- 4.5.3 The main access road from the primary access will provide access for most trips and will need to be adequate to support emergency access to the development.
- 4.5.4 With this in mind the initial route is proposed to consist of two 7.3m carriageways providing two lanes in each direction separated by a grass central reserve, up to an internal roundabout where the road will split.
- 4.5.5 This layout will ensure that there is adequate capacity at the primary access whilst reducing the chance of the access being blocked in an emergency situation.
- 4.5.6 This route will be in the form of a tree lined boulevard, enforcing the rural nature of the development.
- 4.5.7 A primary access route through the development will connect the primary access route to the secondary access. This will consist of a 6.75m carriageway which will cater for bus provision through the site. 3m combined cycle/footways will provide for other road users.
- 4.5.8 A circular route around the edge of the development will consist of two single lane carriageways separated by a grass central reserve. Lane widths will be 3.65m wide to accommodate bus services.
- 4.5.9 The indicative site layout has been designed around a central local centre with walking distance of all dwellings which will be connected by good quality pedestrian and cycle links.
- 4.5.10 The primary road hierarchy is shown in [Figure 4.2](#).

Figure 4.2 : Roman Road Site Access



5. Sustainable Transport Proposals

5.1 Overview

5.1.1 This chapter sets out the high-level sustainable transport strategy for the proposals. Promoting sustainable transport for new sites is a key policy test within the NPPF and local transport policy. An outline strategy has been developed with a view to identifying the opportunities to promote sustainable travel at the site.

5.1.2 The sustainable transport strategy for the development proposals is established upon the following key items:

- Development of a network of pedestrian and cycle routes in the site, linking the various land parcels and with existing local highway network;
- Provision of new bus stops in the site and highway network suitable to accommodate a bus service through the site; and
- Development of a comprehensive Framework Travel Plan to promote sustainable modes of transport from initial occupation.

5.1.3 A 'Movement Strategy' will be developed to inform the development of the design. The main aims of the movement strategy will be to:

Provide safe and convenient surroundings for the movement of people, including those with restricted mobility and cyclists

Create safe routes for pedestrian, cycling and vehicular movement

Keep vehicle flows and traffic speeds low in the vicinity of homes, to create a highway network conducive to walking and cycling

Ensure that reasonable, and where possible direct, vehicular access to each home is available, and enable easy access for public transport and emergency vehicles

Minimise the danger and inconvenience caused by indiscriminate on-street parking

Allow for a diversity of spatial, architectural, and landscape elements appropriate to the unique character of the site and its surroundings

5.1.4 Layout designs will ensure that the convenience of access for pedestrians, cyclists and public transport operators is given priority over the need to accommodate the car. An overview of the opportunities presented by the site is provided in the following paragraphs.

5.2 Walking and Cycling Proposals

5.2.1 In terms of walking and cycling routes, the site will be developed with a focus on prioritising pedestrian activity and cycle movements within the site to encourage non-car modes. In accordance with MfS (1 and 2), the internal layout will be designed by:

Promoting an inclusive environment that recognises the needs of all people of all ages and abilities

Creating a network of streets that provide permeability and connectivity to main destinations and choice of routes

Designing to keep vehicle speeds below 20 mph on residential streets unless there are overriding reasons for accepting higher speeds

Using the minimum number of highway design features necessary to make streets work properly

5.2.2 Whilst it is acknowledged that walking and cycling may not provide a realistic option for commuting purposes externally from the site, a number of improvements are proposed to connect to the local area.

5.2.3 A cycle link to the southeast of the development will provide connection to the country lanes towards Rushton and on towards The Wrekin for leisure trips.

5.2.4 An off-street pedestrian/cycle link will be provided from the development to Wroxeter Roman City. From here, route improvements and signage will be included to provide a connection to the existing alignment of National Cycle Route 45.

5.3 Public Transport Proposals

5.3.1 Based on the level of development, improved public transport services would provide an excellent opportunity to kickstart sustainable travel habits on the Site. The Site would provide additional demand for travel by bus to support enhanced and higher frequency service which would be funded by the development and revenues generated by patronage.

5.3.2 The emerging masterplan has been developed with a view to providing a looped road network, allowing the bus service to be diverted into the development site. This is intended to improve the accessibility of the site to Shrewsbury and Telford, connecting with a wide range of facilities and amenities, wider bus services and railway stations in line with policy aspirations.

5.3.3 Furthermore, through increased patronage, there is an opportunity to increase the frequency of this service to offer a more convenient service to existing and future residents along the route.

5.3.4 Whilst the Estate is not located close enough to the railway to support the provision of a new station, it will benefit from the addition of the Parkway Station, as referenced in Shropshire Council's LTP and LDF. This benefit would be from multi-modal trips involving car trips to the Parkway Station or potentially a dedicated bus service between the Site and the Parkway Station.

5.3.5 Options for improved the bus services for the Site could include:

- Provision of a new bus service connecting the Site to either Wellington Station or the new Parkway Station.
- Provision of an express bus service between Shrewsbury and Telford calling at a limited number of stops within the Site.
- Rerouting the existing number 96 bus service through the Site and increasing the frequency.

5.3.6 The preferred option for the bus strategy for the proposed site is the diversion of the X10 bus route between Shrewsbury and Telford.

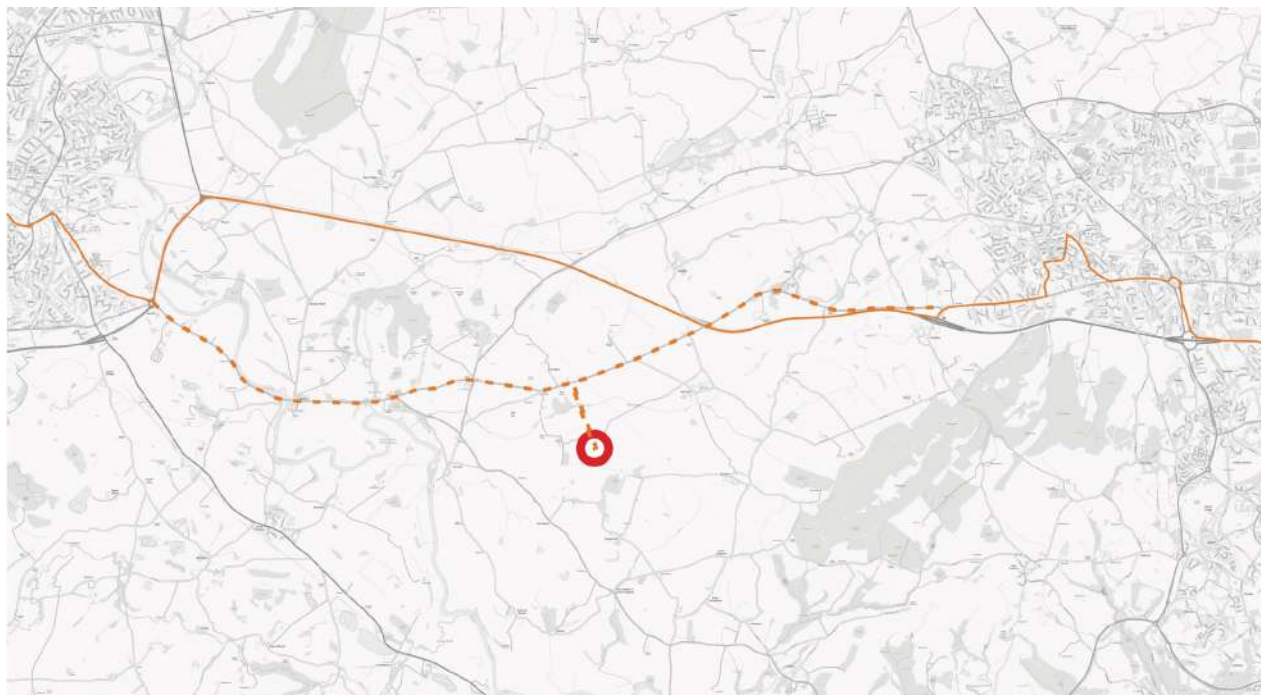
5.3.7 The route currently connects Shrewsbury and Telford included stops at Shrewsbury Colleges, Shrewsbury Business Park, Wellington Train and Bus stations and Telford Colleges.

5.3.8 The route currently utilises the A5 between Shrewsbury Business Park and Wellington Train Station, therefore the proposals are to divert the route along the B5061 between Emstrey Roundabout and Junction 7 of the A5.

5.3.9 Without stopping at the site, the diversion is anticipated to add an additional 2 minutes to the overall journey time. When including the route into the site and the proposed stop the additional journey time will be less than a 10-minute increase.

5.3.10 Journeys times from the site are anticipated to be approximately 25 minutes to Shrewsbury and 26 minutes to Telford based on the existing timetable. The additional patronage and developer funding will enable the increase in this service from every two hours in each direction to a half hourly service in each direction. [Figure 5.1](#) shows the proposed route diversion.

Figure 5.1 : Proposed X10 Bus Route Diversion



5.3.11 As the X10 is an express service, it is proposed that a single bus stop located with the centre of the development and will provide suitable connectivity without impacting the desirability of the route to all users.

5.3.12 As shown in [Figure 5.2](#), much of the development will be located with a 400m walking distance of the proposed bus stop. All other residents will be with an 800m walking distance of the stop and evidence suggests users would be willing to walk further for better quality bus services.

Figure 5.2 : Indicative Internal X10 Bus Route

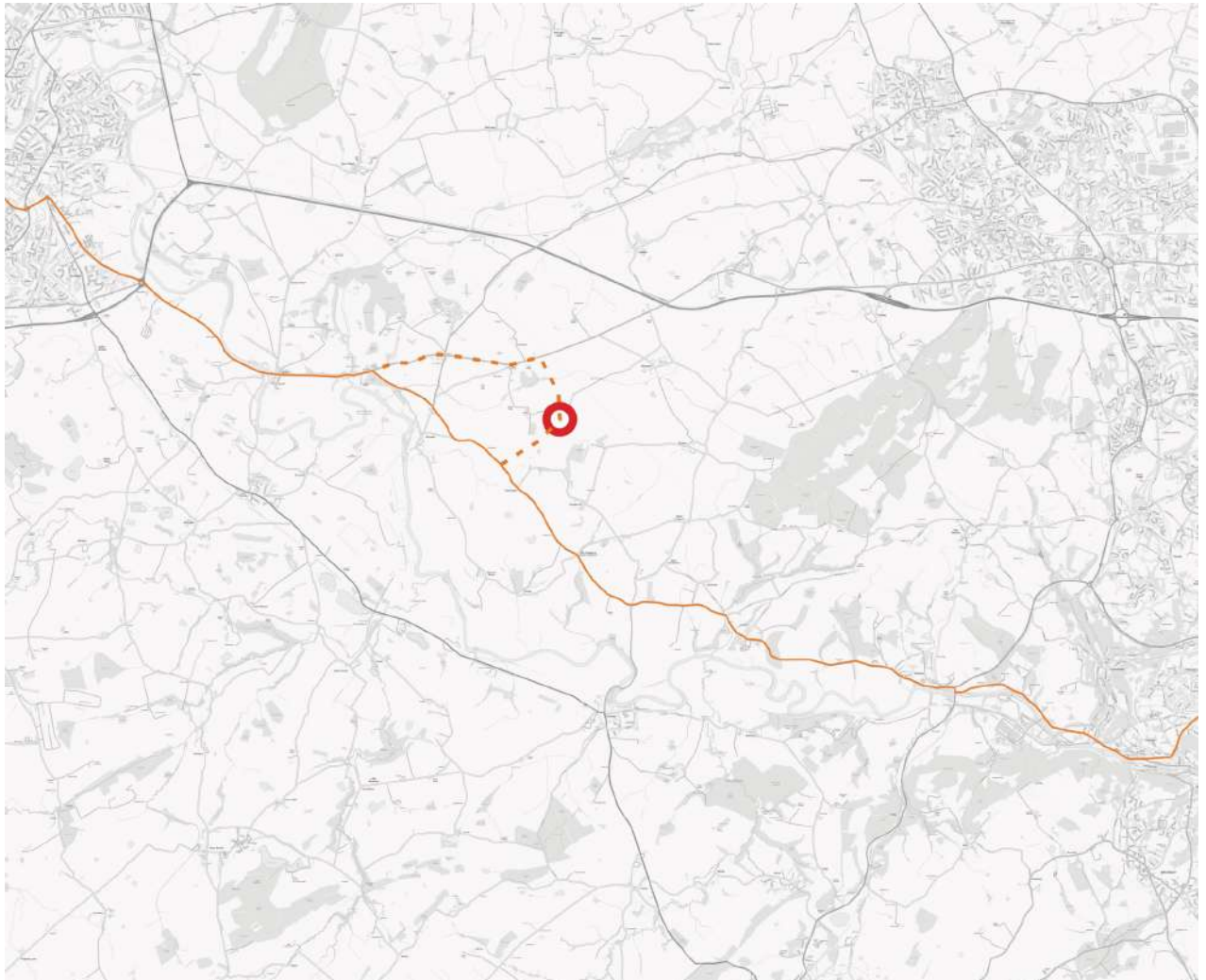


5.3.13 The increase in frequency to the X10 bus service provides an opportunity for the council to utilise the service to serve a potential future Park and Ride site off London Road, adjacent to Emstrey Roundabout which was referenced in the core strategy but is not currently included in the Shrewsbury Moves consultation. This would reduce car trips into the centre of Shrewsbury and could be used to supplement or as an interim measure to the future parkway station proposals.

5.3.14 The 96 bus route between Shrewsbury and Telford is a council subsidised bus route connecting the two towns via Ironbridge and a number of rural settlements to provide connectivity. The service currently operates every 2 hours in each direction, passing the site along the B4380.

5.3.15 The proposal is to divert the route into the site from the secondary access point on the B3480 and provide connectivity to the wider extents of the site before joining the B5061 and re-joining the route at the B5061/ B4380 junction. The proposed diversion route is shown in [Figure 5.3](#).

Figure 5.3 : Proposed 96 Bus Diversion Route



5.3.16 Journey times along from the site are approximately 35 minutes to Shrewsbury and 50 minutes to Telford Based on the existing timetable.

5.3.17 Whilst the diversion of the 96 bus route is not part of the main bus strategy for an express connection between Shrewsbury and Telford, there are opportunities to divert the route into the site. This will improve connectivity to the local areas, including villages, schools and businesses, whilst providing the council with the opportunity to increase revenues for the service and decrease their subsidies.

5.3.18 As shown in [Figure 5.4](#), the proposed route will enable bus stops to be located around the development maximising the number of dwellings within 400m of a stop.

Figure 5.4 : Indicative Internal 96 Bus Route



5.3.19 It is noted that the existing stops at Wroxeter Roman City would no longer be used as a result of the proposals; however, due to the indicative site layout the route could be amended to exit the site on the B3480 to continue service at these stops.

5.3.20 This would enable the service to stop in the proposed local centre and potentially increase patronage further.

5.4 Electric Vehicles

5.4.1 Whilst sustainable travel, particularly public transport, will be promoted for trips to and from the site, it is also recognised that there will be a continuing need for a proportion of future residents to have use of private cars. However, this presents an excellent opportunity to promote and incentivise these car users to use of eco-friendly or Electric Vehicles (EV), in-line with future aspirations of national government.

5.4.2 All homes will come with EV charging points in line with the latest Building Regulations.

5.4.3 As part of the Travel Planning process, the appointed Travel Plan Co-ordinator (TPC) would be responsible for promoting the use of electric/hybrid vehicles at the site.

5.5 Travel Plan

5.5.1 The travel planning strategy for the site will seek to ensure that the long-term management of the promotion and delivery of sustainable transport initiatives will be secured and managed on site by a dedicated TPC.

5.5.2 The TPC will act as a liaison point for residents for any issues or questions relating to the TP. The role will also include liaising with the local authority and public transport operators, where required.

5.5.3 The roles and responsibilities of the TPC will include:

- Administer and manage the TP and provide a liaison with SCC's Travel Planning team when implementing the plan.
- Ensure travel awareness amongst residents.
- Provide a point of contact to discuss travel information and options.
- Promote and encourage the use of sustainable travel modes as an alternative to single occupancy car trips, where appropriate.
- Ensure the availability of the most up to date travel information.
- Undertake passengers usage surveys of bus services to understand demand for increased services.

5.5.4 A site-specific Travel Plan will be developed in consultation with the SCC's Travel Planning team. This will seek to establish a number of SMART targets and actions which will include measures that will be specific, measurable, achievable, realistic and time-related.

5.5.5 This TP will be provided to assist in the site's consideration for allocation and to support central government and local policies to actively manage patterns of growth in order to maximise the use of public transport, walking and cycling where possible. This is particularly important with the emergence of Active Travel England.

5.6 Summary

5.6.1 Given the rural nature of the site, current sustainable travel options are limited. However, the development of a new community on the estate provides an opportunity to improve sustainable accessibility both internally and to key employment areas such as Shrewsbury and Telford.

5.6.2 A strategic development of this scale can also provide financial investment in key strategic transport infrastructure including high-quality limited stop bus services and future Parkway Station at Preston Boats.

5.6.3 Internally a new settlement with homes, schools, a local centre and employment uses can reduce the need to travel longer distance and support a sustainable travel strategy that reduced trips made by car by increasing opportunities to walk and cycle.

6. Development Phasing

- 6.1.1 Whilst the exact phasing of the development has not been subject to a detailed review, an indicative construction breakdown has been provided to detail how the site may be accessed by sustainable modes of transport and the provision of on-site amenities to reduce the need to travel.
- 6.1.2 The Travel Plan manager will continuously review bus usage to ensure that services are increased as required to support demand at the site. The landowner and agents will monitor the uptake and demand for employment and commercial space and ensure that this is provided in advance of demand.
- 6.1.3 It is anticipated that a site of this size would be constructed by multiple contractors at the same time, so a buildout rate of 150 dwellings per annum has been assumed based on buildout by 4 contractors.

Year 1

- Construction of the main site access via B5061
- Construction of 150 dwellings
- Diversion of bus route X10 into the site

Year 2

- Construction of 150 dwellings
- Construction of primary school

Year 3

- Construction of 150 dwellings
- Construction of commercial space to provide space for Convenience Store / GP / Dentist
- Increase X10 frequency to every 30mins

Year 4

- Construction of 150 dwellings
- Construction of employment space

Year 5

- Construction of 150 dwellings

- Increase X10 frequency to every 15/20 minutes subject to passenger demand

Year 6

- Construction of 150 dwellings
- Construction of additional commercial space subject to demand

Year 7

- Construction of 150 dwellings
- Construction of additional employment space subject to demand

Year 8

- Construction of 150 dwellings
- Construction of community centre / leisure facility / sports pitches

Year 9

- Construction of 150 dwellings

Year 10

- Construction of 150 dwellings
- Construction of secondary access via B4380
- Diversion of 96 bus route into site

Year 11

- Construction of 150 dwellings
- Expand primary school subject to demand

Year 12

- Construction of 150 dwellings
- Explore Parkway Station shuttle bus service demand

Year 13 – Year 24

- Construction of 1700 dwellings in satellite suburbs
- Construction of secondary school / college subject to demand

7. Summary

- 7.1.1 Mode has been appointed by Raby Estate to prepare a Highways and Transport Strategy for a potential strategic settlement on land within the Beslow area of the Raby Estate in Shropshire. The proposals for a new settlement include a first phase of 3,500 new homes, a primary school, a local centre and an employment area.
- 7.1.2 The Site is located 10km to the east of Shrewsbury and 12km to the west of Telford. The site abuts Roman Road (B5061) and the Horseshoe Inn to the north, with open agricultural fields to the east and west. To the south, the site boundary abuts the B4380 and the hamlet of Donnington.
- 7.1.3 To inform the Transport and Highways Strategy, Mode has sought to consult with Local Highway Authority, SCC Highways, and strategic highway authority, National Highways. A meeting was held with Highways England to discuss the future scheme.
- 7.1.4 Primary access to the site can be achieved from Roman Road via a roundabout junction and presented in [Chapter 4](#). A secondary access would be taken from B4380 in the form of a priority junction. Both accesses can be delivered with land controlled by the Raby Estate. The internal road network would be designed in accordance with SCC's Residential Design Guide and MfS.
- 7.1.5 Given the rural nature of the site, current sustainable travel options are limited. However, the development of a new community on the estate provides an opportunity to improve sustainable accessibility both internally and to key employment areas such as Shrewsbury and Telford, as set out in [Chapter 5](#). A strategic development of this scale can also provide financial investment in key strategic transport infrastructure including high-quality limited stop bus service. Internally a new settlement with homes, schools, a local centre and employment uses can reduce the need to travel longer distance and support a sustainable travel strategy that reduced trips made by car by increasing opportunities to walk and cycle.
- 7.1.6 The aims of the Shrewsbury Moves Strategy and the sustainable travel strategy for the site are aligned, aiming to reduce car trips and increase the use of sustainable modes of travel. Improvements to bus reliability and reduced town centre parking compliment the site strategy for an improved high frequency bus service connecting the site with Shrewsbury and Telford and will ensure sustainable travel from the site becomes the priority over car use.
- 7.1.7 The introduction of the Parkway Station to the east of Shrewsbury results in the site being well located to support sustainable travel across the West Midlands Region for future residents.
- 7.1.8 The indicative phasing strategy outlined in [Chapter 6](#) seeks to demonstrate how the site will be developed to ensure that sustainable travel and access to amenities will be prioritised to reduce the need for new trips on the Local Highway Network.

7.1.9 This strategic site presents an excellent opportunity to create a new community in a rural location. Whilst the rural nature of the site currently provides limited opportunities to travel by sustainable modes, the scale of nature of the development will provide investment to improve public transport in the area and encourage limited car travel internally between homes, jobs, schools and other local amenities.

APPENDICES

APPENDIX A

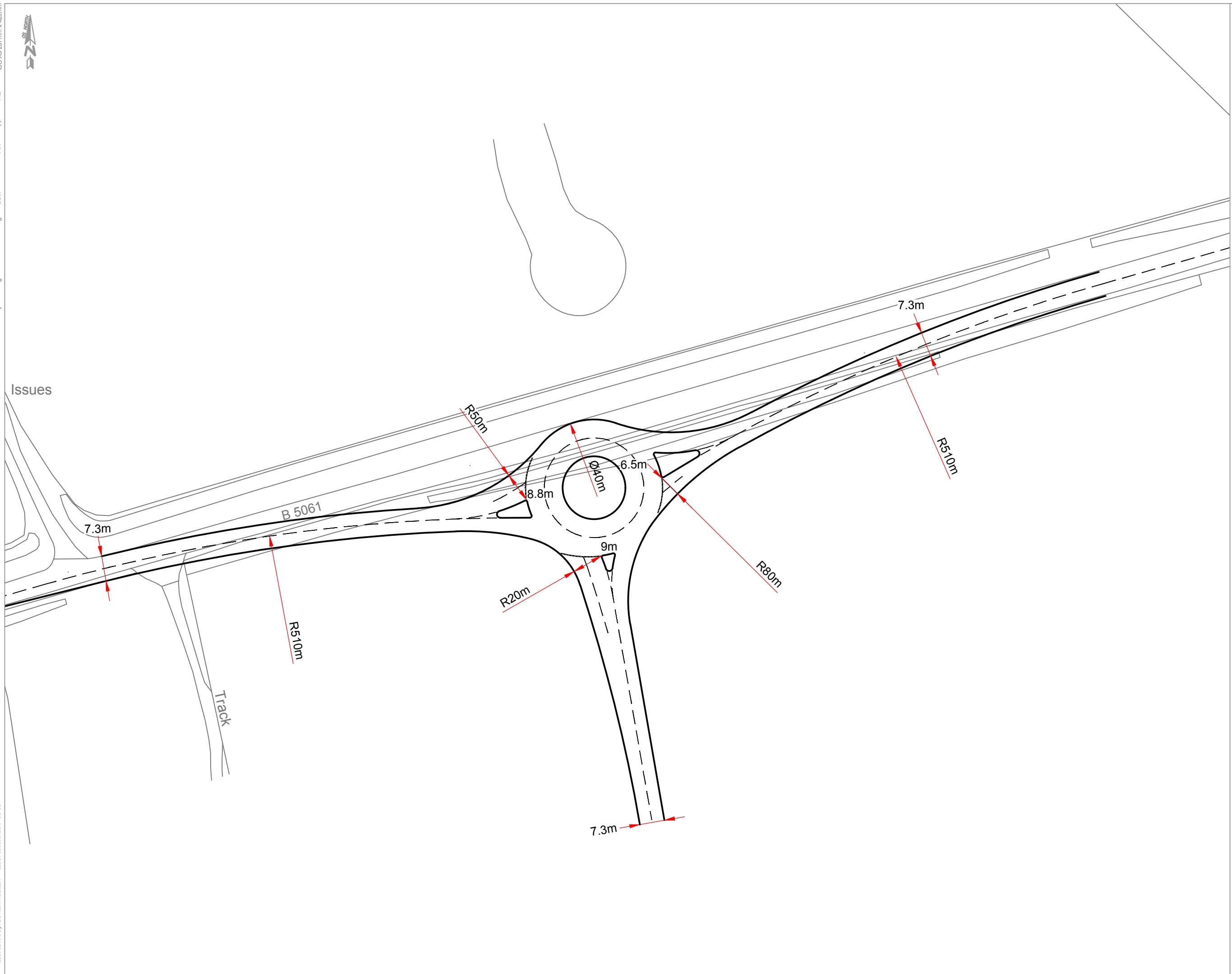
Site Access Drawing

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Last saved by: LUKEWHEELER Last Plotted: 2019-08-30

Project Management Initials: Designer: LCW Checked: MA Approved: ME



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- notes:
1. this drawing is to be read in conjunction with all other relevant drawings, any discrepancies, errors or omissions to be brought to the attention of overseeing organisation.
 2. all dimensions to be checked before commencement of work on site.
 3. all dimensions in metres unless otherwise stated.
 4. the design is subject to approval of shropshire county council.
 5. drawing based on os mapping.

Issue/revision	date	description
A	30/08/2019	Issued
-	29/08/2019	Issued
U/R	date	description

client: raby estate
project: raby estate shropshire
project number: J324128
scale: 1:1000@A3
drawing title:
proposed site access junction
drawing number:
J32-4128-PS-001



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London

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Manchester

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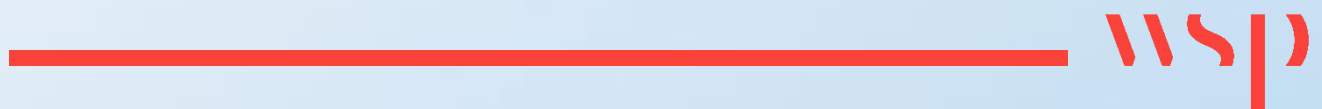
Reading

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Appendix C


BESLOW HISTORIC ENVIRONMENT BASELINE ASSESSMENT AND CONSTRAINTS AND OPPORTUNITIES REPORT



**Historic Environment Baseline Assessment &
Constraints and opportunities report,
Beslow new settlement,
Raby Estates, Shropshire**



May 2024

Client	Raby Estates	
Site name	Beslow new settlement	
Report type	Historic Environment Assessment	
Report reference	P00245.02.01	
Report date	15 May 2024	
Prepared by	Helena Kelly, BSc, MIFA	
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Revision history	V1.0	Final draft
		

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1 Executive summary

- 1.1. This report has been prepared as part of a representation in response to the Sustainability Appraisal provided by Shropshire Council in relation to the potential allocation of land at Beslow.
- 1.2. This report relates to heritage matters, and responds to comments received from Shropshire Council. The council has advised that due to the potential for substantial negative impacts relating to development within the setting of Wroxeter Roman Town scheduled monument and on non-designated cropmark evidence within the site, the site should not be allocated.
- 1.3. This report demonstrates that the masterplan has been carefully considered in response to heritage assets. Notably, the following constraints have informed the design development as currently proposed:
 - Heritage assets associated with Roman town have been avoided by the built form of the development, including the cemeteries and aqueduct;
 - The medieval earthwork enclosure at Uppington is also avoided; and
 - An enclosure and double ditched enclosure can also be protect 'in situ' through design refinement and strategic use of open space within the masterplan proposals.
- 1.4. The proposals go further in allowing for significant heritage benefits through the positive management of archaeological features within areas of proposed parkland and rewilding. Links between the Site and the Roman town would allow for the hinterland to be better understood and more accessible.
- 1.5. The conclusion of this report is that in relation to the historic environment, the proposals can be brought forward with suitable embedded and additional mitigation measures in place to ensure that any historic environment effects are less than substantial.

2 Introduction

- 2.1. This historic environment baseline assessment and constraints and opportunities report has been prepared by Heritage Archaeology, on behalf of Raby Estates, to inform masterplan development and support the local plan examination in relation to land at Beslow, Shropshire.
- 2.2. Raby Estates are seeking to secure inclusion in the local plan for an area of residential development on their land at Beslow, Shropshire. This report has been prepared to directly respond to comments made by Shropshire Council in the latest Sustainability Appraisal (GC44). This is considered in greater detail in the representations prepared by WSP.

Site location

- 2.3. The area of the proposed allocation is centred at grid reference SJ58100870, the closest post code is SY5 6PX. The land is currently predominantly in agricultural use (mostly arable with some grazing).
- 2.4. The site area is shown on drawings in the planning representations prepared by WSP, to be read in conjunction with this report. It is noted that the site area (hereafter 'the Site') includes areas of built development and also areas of parkland creation, rewilding, and meadow.

Aims of the historic environment assessment

- 2.5. This report addresses the comments relating to heritage in the Sustainability Appraisal and demonstrates that the scheme is technically deliverable.
- 2.6. An objective of this report is to determine, as far as reasonably possible from existing records, the nature, extent, and value of any heritage assets that could be affected by development within the Site. The assessment has also used background data to evaluate the potential for previously unrecorded heritage assets to be present within the Site.
- 2.7. The Sustainability Appraisal noted, under the heading "Heritage Comments Significant Constraints" that "*Site likely to have a substantial negative impact on setting of the Scheduled Monument of Site of Roman town of Wroxeter (Viroconium) (NHLE ref. 1003705). Number of known cropmark sites which may be associated with the Roman city situated within site boundary, whilst very large size of site and proximity to Wroxeter suggests it otherwise has high archaeological potential.*" The Sustainability Appraisal concluded "Do not allocate" in relation to heritage.
- 2.8. A further specific aim of this report is to address the comments relating to heritage in the Sustainability Appraisal. The report will demonstrate that the proposal has a master plan informed by preliminary heritage surveys which recognises the significance of Wroxeter Roman Town and respects its setting, minimising potential impacts. Also, this report identifies the associated cropmarks outwith the scheduled monument associated with Wroxeter and demonstrates that these are preserved *in situ* and enhanced by the proposed master plan.

Assumptions and limitations

- 2.9. This report provides a high level review of the known and potential historic environment resource within the study area to inform the master planning and provide some broad indications regarding the relevant historic environment constraints and opportunities. It is not a detailed desk-based assessment.
- 2.10. Archaeological evidence is often buried and invisible from the ground surface, it is therefore possible that the extent, character and significance of an asset could vary from that described in the consulted data sources. A reasonable worst case has been taken in the assessment that follows, and professional judgement used to determine the likely value of heritage assets where the precise nature of the asset is not known.

Planning context

The National Planning Policy Framework (NPPF), 2023

- 2.11. The National Planning Policy Framework December 2023 (NPPF) sets out the Government's planning policies for England and how should be applied. The NPPF includes three overarching objectives for the planning system (section 2, paragraph 8), including "*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment...*".
- 2.12. In Section 16 'Conserving and enhancing the historic environment', Paragraph 200 directs that that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of
- 2.13. Paragraph 209 relates to non-designated heritage assets, again directing that the proposal on their significance.
- 2.14. Paragraph 206 of the NPPF notes that the significance of a heritage asset can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting.
- 2.15. Paragraph 207 directs that applications that would lead to substantial harm to or total loss of significance of a designated heritage asset should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefit.
- 2.16. Paragraph 208 of the NPPF directs that less than substantial harm should be weighed against the public benefits of the proposal. "*in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*"

Local Plan

2.17. DP24 'Conserving and Enhancing the Historic Environment' of the Draft Shropshire Local Plan 2016 – 2038 relates to heritage assets, designated and non-designated and includes provisions that are consistent with the NPPF, above. The policy includes the following provision:

- *6: Encouraging development which delivers positive benefits to heritage assets. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition*

Best practice and guidance

2.18. The following guidance documents have been referenced in preparing this report.

- Historic Environment Good Practice Advice in Planning 2, Managing significance in decision-taking in the historic environment, Historic England, 2015;
- Historic Environment Good Practice Advice in Planning 3, 2nd Edition (GPA3): The Setting of Heritage Assets, Historic England, 2017;
- Conservation Principles; Policy for the Sustainable Management of the Historic Environment, Historic England, 2008; and
- Chartered Institute for Archaeologists, Standard and guidance for historic environment desk-based assessment, CIFA, 2022.

2.19. Conservation Principles identifies the heritage interest (or values) that can be attached to places to help define heritage significance, these comprise:

- Historical value (historic interest in NPPF terminology): the way in which a heritage asset can illustrate past people, events and aspects of life and includes illustrative, associative values, as well as communal value (symbolic and commemorative and social values);
- Evidential value (archaeological interest in NPPF terminology): a heritage asset can hold, or potentially hold, evidence of past human activity that can be revealed through investigation;
- Aesthetic value (architectural or artist interest in NPPF terminology): This derives from a contemporary appreciation of the asset's aesthetics or historic design intention.

3 Method of assessment

Study area

- 3.1. Data on designated and non-designated heritage assets was obtained for the Site and a buffer of approximately 500m from the Site boundary. This study area was designed to include assets adjacent to the Site but with the potential to extend into it, also to place known assets into a wider context, and to provide context when considering the archaeological potential of the Site. It also allowed consideration of effects on the settings of heritage assets.

Data sources

- 3.2. The following data sources were consulted in compiling this report:
- Historic Environment Record (HER) for Shropshire;
 - Shropshire Council data for locally listed buildings and conservation areas;
 - National Heritage List for England (NHLE), Historic England data on designated heritage assets;
 - The National Record of the Historic Environment (also known as PastScape), maintained by Historic England and viewed via the Heritage Gateway website; and
 - Online archive data and historic Ordnance Survey mapping.

Determining the level of effect

- 3.3. The level of effect on a heritage asset has been determined by assessing the heritage value of the asset, then comparing that to the predicted magnitude of change (the impact).

Heritage value

- 3.4. Heritage value (significance) has been assessed for each asset as being either high, moderate, low or negligible. Assets with **high** value include those that have a designation, as they meet national criteria for designation under the relevant legislation or planning policy provisions. Assets that are not scheduled monuments, but of demonstrably equivalent significance have been treated as if they were scheduled and accorded high value. The NPPF describes scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites as heritage assets of the highest significance. In the professional judgements made in determining the level of effect, this relatively higher level of significance is considered.
- 3.5. Assets with **moderate** value are those that have regional interest, being good examples of regional archaeology or architecture, or having regionally significant historic interest. Assets with **low** value are those that are locally significant, being well represented regionally and nationally, or based on the condition of the asset. Assets with **negligible** value will typically demonstrate poor survival or very limited historic, architectural, or archaeological interest.

4 Historic and archaeological context by period

Location, topography and geology

- 4.1. Beslow lies between Shrewsbury and Telford, to the north of The Wrekin and east of Wroxeter Roman Town. It is within the modern parish of Wroxeter and Uppington, Shropshire. Historically these were separate parishes.
- 4.2. The geology of the Site is mainly Till over Sandstone. The Site is within the central Shropshire plain, an area of gently undulating farmland. The national historic landscape characterisation project records the Site as largely part of a pattern of enclosed agriculture, amalgamated fields, typically of modern, post-war form.
- 4.3. The Site lies to the south of the Bell Brook, a tributary of the River Severn which lies to the west of Wroxeter. The topography of the Site includes land that slopes gently from north to south with the valley of the Bell Brook at approximately 78m above Ordnance Datum (aOD) to the north and Beslow at approximately 90m aOD. The land also slopes down towards the Severn valley, with Uppington lying at approximately 99m aOD and Wroxeter at 65m aOD.

Palaeolithic – Bronze Age

- 4.4. The valley of the River Severn and lighter soils and landscape prominence of The Wrekin have evidently attracted settlement from the prehistoric period onwards. The scheduled group of round barrows at Willowmoor attests to this prehistoric activity in the wider area.
- 4.5. However, there is little evidence for settlement predating the Iron Age in the Site or Study area, a single reported find of a flint thumb scraper and the recorded locations of two circular ditches identified from cropmarks and a ploughed out circular earthwork tentatively identified as a barrow are the only recorded evidence within the study area for this period.

Recorded heritage assets within the study area

- 4.6. Heritage assets dated to the early – mid prehistoric period recorded within the study area include:
 - MSA14950 Circular Enclosure c400m E of Wroxeter Defences
 - MSA14951 Circular Ditch c500m SE of Wroxeter Defences
 - MSA13557 Earthwork c 490m NW of Beslow, Ploughed out? Round barrow of Bronze Age date, previously visible as an earthwork.
 - MSA14711 Find Spot c1995 of a flint thumb scraper near Wroxeter.

Iron Age

- 4.7. The study area lies within the territory occupied during the Iron Age by the Cornovii people. The Wrekin is the site of a hillfort. Ptolemy describes the territory of the Cornovii as including the towns 'Deva' (Chester) and 'Virconium' (Wroxeter). The land around the town at Wroxeter is likely to have been good farming land and lowland farmstead settlements are believed to

have been widespread throughout the hinterland of Wroxeter. Numerous potential enclosures of Iron Age date have been identified through aerial photography within the study area.

Recorded heritage assets within the study area

4.8. Heritage assets dated to the Iron Age period recorded within the study area include:

- MSA13838, Rectangular cropmark Enclosure
- MSA14563, Enclosure to the E side of Wroxeter
- MSA14689, Find Spot before 1992 of a Donside Terret near Wroxeter.
- MSA1611, Middle Crows Green Enclosure, Circular enclosure of probable Iron Age to Roman date
- MSA14688, Cropmarks c 500m E of White Gates
- MSA13201, Cropmarks of linear features c 150m E of The Wythyns. Close examination of the air photographs shows the field to be largely covered by networks of parallel ditch soilmarks, generally orientated north-west to south-east. Since the field is upon a gentle south-east facing slope, the markings are almost certainly those of field drainage.
- MSA31502, Double ditched sub rectangular enclosure 350m south of Beslow, Double ditched sub rectangular enclosure 350m south of Beslow identified during 2010 aerial photographic survey.
- MSA108, Single ditched, sub rectangular cropmark enclosure at Beslow, Single ditched, sub rectangular cropmark enclosure of probable Iron Age to Roman date. A second enclosure with rounded corners is visible to the southeast.
- MSA110, Rectilinear cropmark enclosure, Beslow, Rectilinear cropmark enclosure of probable prehistoric to Roman date, with an opening at the north east corner.
- MSA13998, Cropmark enclosure c.260m SE of Uckington
- MSA14422, Find Spot in 1983 of a bronze cube at Meadow Farm.
- MSA38629, Possible rectilinear cropmark enclosure, c.475m NE of Halfway Meadow

Roman

4.9. The Roman period began in Britain with the Roman invasion of AD43. The Romans established a military presence in the south of England and pushed north, founding roads and fortresses and later civilian settlements. There is evidence that the Roman army reached the area of the Cornovii in the late 40s AD. Temporary campaign camps were built on both banks of the Severn, to control a crossing point, and a fort for 500 cavalrymen was established to the south of Wroxeter. A fortress was built to replace the fort in the 50s AD, this became the nucleus for the later town of Wroxeter. The fort was positioned on high ground above a ford across the River Severn and with a water supply from the Bell Brook to the north. The fort served as a base for the Roman campaign into Wales. The fort became redundant as the Roman army conquered Wales and pushed north into Scotland, and in the late 1st century the defences were levelled and the settlement expanded as a town funded by a civic authority. Wroxeter became one of

22 major towns in Roman Britain, and one of 17 civitas, capitals based on the Iron Age tribal centres, Wroxeter became known as 'civitas Viroconium Cornoviorum, this means 'Viroconium', the town of the Cornovii'.

- 4.10. The Roman town occupies a well-defined area but significant Roman activity has been recorded beyond the town's extent. This includes cemeteries to the north east of the town, an aqueduct bringing water into the town from the Bell Brook, extra mural settlement and farmsteads, potentially demonstrating continuous settlement activity from the Iron Age.
- 4.11. Roads radiated from Wroxeter, to the north, south, east and west. These include Watling Street to the north of the Site, now the B5061 as it approaches Wroxeter.

Recorded heritage assets within the study area

- 4.12. Heritage assets dated to the Roman period recorded within the study area include:
- SM 1003705, Scheduled Monument, Site of Roman town of Wroxeter (Viroconium)
 - SM 1003713, Scheduled Monument, Wroxeter Roman fort
 - LB 1239503, Grade II listed Roman altar approximately 5 metres to south east of nave of Church of the Holy Trinity, Uppington
 - MSA104, Wroxeter Roman Town
 - MSA105, Wroxeter Aqueduct, Linear ditch following contours of Bell Brook into Wroxeter Roman Town showing on 1890 OS map
 - MSA13084 -5, Middle Crows Green cemetery, Wroxeter, The principal cemetery of the Roman town of Wroxeter. Excavations in 1861-2 found a broken tombstone and the site of a possible mausoleum, together with a number of interments and cremation burials laid out in rows
 - MSA13088, Excavation at Middle Crows Green Cemetery, Wroxeter (1973)
 - MSA13091-13157, Excavations at Roman Wroxeter
 - MSA14709, Finds in 1995 of Roman material suggesting a Roman villa SE of Uckington
 - MSA13062 -3, Excavations on Wroxeter defences (1862)
 - MSA13064, Excavation on Wroxeter defences (1936)
 - MSA13066, Excavated section of Wroxeter defences
 - MSA13070, Excavation of town defences at Fingerpost Cottage, Wroxeter (Insula 14)
 - MSA13072 -5, Excavation on defences of legionary fortress, Wroxeter (1975 & 1991-2)
 - MSA13082, Find Spot before 1872 of a Roman coin hoard at Horseshoe Lane, Wroxeter
 - MSA13083, Wroxeter, Insula 16 and north-east area inside defences
 - MSA13087, Cunorix tombstone, outside Roman defences, Wroxeter
 - MSA13159 - 60, Extramural occupation, early civilian settlement, Wroxeter

- MSA153, Watling Street, east of Wroxeter
- MSA106, Wroxeter Marching Camp B (Norton 2), Temporary marching camp of Roman date, with the excavated eastern defences comprising a ditch with a slot in the bottom
- MSA107, Cropmark complex around Norton, Multi-period cropmark complex consisting enclosures, drove road, and field systems around Norton Farm, Norton.
- MSA13086, Wheatfield cemetery, Wroxeter
- MSA14151, Find Spot before 1882 of Roman coins and vase in Uppington.
- MSA33754, Possible site of Roman Bath House, SE of Wroxeter, The collection of surface finds and the results of a small scale resistivity survey suggest the presence of a bath house building, adjacent to a small stream heading SE of Wroxeter. Fuller survey would be required to verify the exact nature of this building.
- MSA36555, Excavated remains of Roman cremation cemetery, NE of Norton, The remains of a cremation cemetery of Roman date, excavated along the route of the Shelton Resilience Scheme pipeline, in 2013
- MSA37852, Cropmark of NE corner of possible Roman temporary camp, c.485m SSW of Wheathill Farm, Uppington

Early medieval

- 4.13. The Roman period ended with the withdrawal of Roman troops and officials from Britain during the early 5th century. The Roman town was gradually abandoned and returned to farmland, although a small area close to the ford continued to be settled and became the village of Wroxeter, focused around the ford and Church of St Andrew. The church has an 8th century cross indicating that Wroxeter was settled during the Anglo-Saxon period. There is evidence that Wroxeter Roman town converted to Christianity and there is then evidence for continuity from the Roman to post Roman settlement at Wroxeter.
- 4.14. Place names provide further evidence for a shift in settlement pattern during the early medieval period from Wroxeter and the farmsteads that surrounded it to the villages currently within or close to the study area; Uppington is first documented in the Domesday Book with the entry recording that 'Godwine held it' indicating that there was a settlement there prior to the Norman conquest. However, it is described as waste when it was acquired by Gerard, the lord in 1086. This may have resulted from the harrying that followed a number of failed Anglo-Saxon rebellions against Norman rule. Wroxeter is recorded in the Domesday Book as a relatively large settlement with four priests and the entry notes 'there is a church'. The church was likely a precursor to the medieval St Andrew's Church, which includes both Roman masonry and Anglo-Saxon elements.

Recorded heritage assets

- 4.15. Heritage assets dated to the early medieval period recorded within the study area include:
- LB 1224008, Grade I listed Church of St Andrew, Wroxeter

- MSA13155, Wroxeter, early medieval urban form

Medieval

- 4.16. By the medieval period, the Site lay within the hamlet and fields of Beslow, and fields within the parishes of Wroxeter and Uppington. Documentary references to Donnington date from the 12th century and Beslow appears in documents from the 13th century.
- 4.17. There is some documentary evidence for a settlement called Siwaldston in the manor of Eyton on Severn, which may have been in the area of Charlton Hill. There is also a documented grange of Wombridge Priory believed to have been within Uppington parish (discussed further below). Beslow, Uppington and Wroxeter are shown on Joan Blaeu's map of Shropshire dated 1662 – 65 which is likely to be a good representation of the medieval settlement pattern. Beslow is depicted with the symbology for a church on this mapping.



Figure 1: Bleau Atlas Maior 1662-65, Volume 5 Comitatus Salopiensis¹

Recorded heritage assets

- 4.18. Heritage assets dated to the medieval period recorded within the study area include:
- LB 1273575, Grade II* listed Church Of The Holy Trinity, Uppington
 - MSA714, "Wicherley Deserted Medieval Village, Wycherley, Wichele or Hiccholetie was a grange of Wombridge Priory. The majority of the features at the site are ridge and furrow and furlong boundaries with a number of later drainage features"
 - MSA14941 Earthwork complex c1km SW of Uppington

¹ Reproduced with the permission of the National Library of Scotland <https://maps.nls.uk/view/104188129>

- MSA2402 Beslow Chapel, Site of a Chapel of medieval date.
- MSA1880 Possible deserted medieval settlement at Siwaldston, Documentary evidence for deserted settlement of medieval date.
- MSA1911 Grange at Uckington

Post medieval

- 4.19. The Site is predominantly agricultural land, with one hamlet, now a farm within the Site. Beslow, shown on historic mapping as including cottages, a smithy and a hall, lies within the Site. It is likely to have been a small settlement from the medieval period, and at one time may have had a chapel. During the post medieval period it is documented as mainly comprising a farm and farmworkers dwellings. Photographs of the hall in the Shropshire Record Office show it in a derelict condition, it was demolished in the late 20th century. The Cassey Shropshire Directory, 1875, records Beslow as follows: *"about one and a half mile from the church, is a genteel residence, in the occupation of George Jukes, Esq. Eyton-on-Severn, now the residence of T. L. Meire, Esq., was formerly the seat of the Newport and the Bradford families. The house is pleasantly situated on rising ground, and commands pleasing views of the windings of the Severn and the Welsh mountains. On one of the octagon towers is carved on a stone the following inscription :- "This coppice adjoining was raised by acrons [sic] sowed at Michaelmas, 1663."*
- 4.20. Historic mapping shows Beslow with a farmstead, house and cottages. Also shown on historic mapping are Horn Cottage, no longer extant although a barn shown on mapping with Horn Cottage is extant. There were also a number of cottages on the southern side of a holloway to the north of Donnington. The field pattern on historic mapping is one of small, irregular enclosure, typical of informal enclosure patterns dating from the later medieval or early post medieval periods. These fields were reorganised in the 19th century, and further amalgamation took place during the 20th century, as a result the historic field pattern is not well preserved in the study area.

Recorded heritage assets

- 4.21. Heritage assets dated to the post medieval period recorded within the study area include:
- 1224775, Churchyard Gates Gate Piers And Approximately 3 Metres Of Flanking Walls Approximately 10 Metres To West Of West Tower Of Church Of St Andrew
 - 1224776 Folly Approximately 30 Metres To South West Of Wroxeter Grange
 - 1223738 Donnington House
 - 1224437 Upper Farmhouse
 - 1224481 Glebe Cottage
 - 1224001 1 Norton Cross Roads
 - 1224002 Norton Farmhouse
 - 1224004 3 Rushton

-
- 1224005 Middle Farm Cottages
 - 1224006 Uckington Farmhouse
 - 1224007 The Old Post Office
 - 1223167 Former cottage approximately 10 metres to north west of Donnington House
 - 1223168 Pump approximately 2 metres to north east of former cottage approximately 10 metres to north west of Donnington House
 - 1239502 Avenue Farmhouse
 - 1239885 2 Uppington
 - 1267430 Garden wall adjoining Charlton Hill Manor to east
 - 1267042 2 And 3 Norton Cross Roads
 - 1267043 The Shop
 - 1267044 Lower Farmhouse
 - 1267045 Yew Tree House
 - 1266671 Wroxeter Grange
 - 1273665 Number 1 (Tudor House) And Part Of Number 2
 - 1267155 Charlton Hill Manor
 - 1267269 Horse Shoe Inn
 - 1223166 milestone approximately 600 metres to south west of charlton hill house
 - MSA16141 The site of Beslow Hall, A probably late 16th century house, described as one of the county's finest houses. Demolished in 1985.
 - MSA29842 Beslow Farm, Beslow Farm, largely from the digital version of the c.1900 OS large scale mapping.
 - NA Beslow Cottages
 - NA Horn Cottage, cottage and barn on historic mapping
 - NA Holloway and cottages, footpath near Charlton Hill Gorse; the tithe map records three cottages and gardens on the southern side of the holloway.
 - MSA17268 The site of a former Toll House on B4380, Donnington, The site of an 18th/19th century toll house, since demolished
 - MSA29850 Uckington Farm
 - MSA30412 Charlton Hill Farm
 - MSA30413 Donnington Farm
 - MSA30830 Quarry and reservoir SW of The White House, Rushton
 - MSA32195 Old Quarry, Charlton Hill

- MSA3482 Charlton Mill (wind)
- MSA39536 Barn, now Coach House and Stable Block apx 15m to W of Charlton Hill Manor, Charlton Hill, Wroxeter
- MSA39538 Barn at Charlton Hill Manor, Charlton Hill, Wroxeter
- MSA4109 Charlton Hill Garden, A probable 17th century garden, associated with Charlton Hill House



Figure 2: Ordnance Survey, County Series Shropshire, 1881-1887, 1:10,560²

Modern

4.22. RAF Atcham was an airfield established in 1941 under the control of No 9 Group of Fighter Command. It then passed to the American 8th Air Force, the site was returned to farmland by the 1950s. The site was farmland throughout the 20th century, with Beslow being modified as a settlement with the demolition of the hall and construction of large modern farmbuildings.

Recorded heritage assets

4.23. Heritage assets dated to the modern period recorded within the study area include:

- MSA36713 Site of Atcham Airfield Dispersed Site Number 12, RAF Atcham, Attingham Deer Park
- MSA24038 Site of RAF Atcham (USAAF Station 342), Structural and possible below ground remains of a World War II airfield.
- MSA36718 Structural remains of cantilevered pillbox, RAF Atcham, Uckington Farm
- MSA36720 Structural remains of Battle Headquarters, RAF Atcham, Uckington Farm

² Reproduced with the permission of the National Library of Scotland <https://maps.nls.uk/view/101594419>

Summary historic and archaeological context

- 4.24. A search of the portable antiquities scheme data base (the record of reported archaeological finds made by members of the public), predictably identifies a concentration of Roman, medieval and post medieval finds within the study area. Iron Age, Bronze Age, Neolithic and Mesolithic finds have also been reported from this area.
- 4.25. The Site lies within close proximity to Roman Wroxeter, a Roman town founded as the capital of the Cornovii tribal region, and a number of cropmark enclosures within the vicinity of Wroxeter are likely to be associated with Iron Age activity.
- 4.26. Wroxeter was largely abandoned although the area of Wroxeter village continued to be settled in the post Roman period. Uppington was also extant prior to the Norman conquest.
- 4.27. Villages developed at Wroxeter, Uppington and Donnington during the medieval period, and a hamlet or township was also extant at Beslow, possibly with a church and certainly with a hall.
- 4.28. During the post medieval period the site was largely in agricultural use with some outlying farms and cottages, although settlement continued to be focused on the villages established during the medieval period or earlier.
- 4.29. The field pattern was significantly modified in the 19th century and the fields amalgamated during the 20th century.

5 Heritage assets within and close to the Site

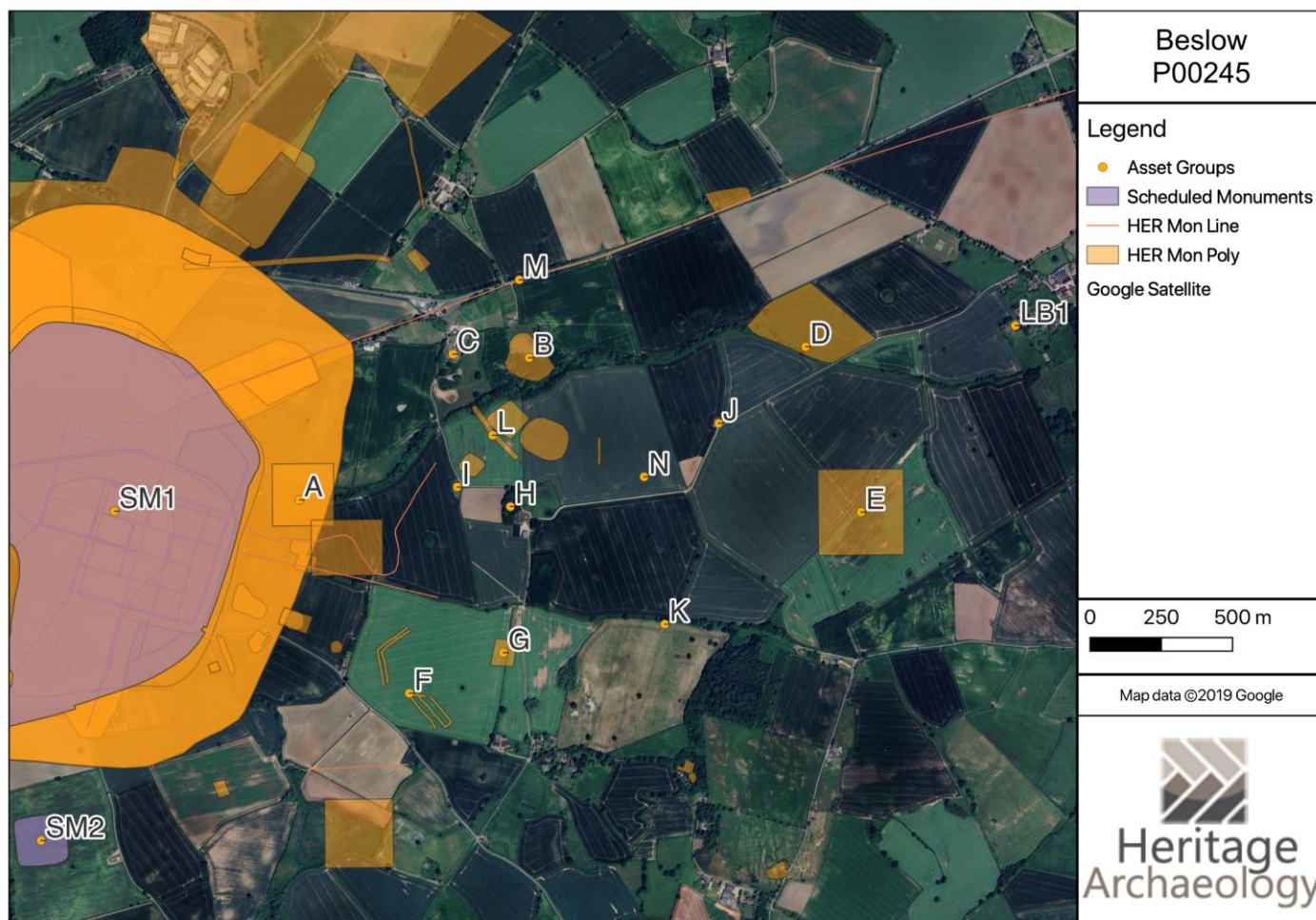


Figure 3: The heritage asset groups

Archaeology and built heritage within the Site

- 5.1. **Asset groups A and B** are groups of assets broadly associated with the Roman occupation at Wroxeter (MSA104). These assets include the cemetery at Middle Crows Green (MSA13084 -5) and the Roman Aqueduct (MSA105). These are assets associated with the nationally important scheduled town of Wroxeter. They are primarily of archaeological interest at a moderate level given the predicted level of survival and condition of the assets.
- 5.2. **Asset C** is an RAF Atcham dispersal site (MSA36713). The asset holds historic interest as an asset associated with the Second World War site at Atcham. The condition of the asset indicates that it is likely to be of low value.
- 5.3. **Asset D** is the site of Wicherley Deserted Medieval Village, as recorded by the historic environment record (MSA714). This recorded location is based on field surveys and documentary research but could be in error, as the earthworks at this location are more in keeping with agricultural practice than settlement activity. An alternative location could be the enclosure (Asset E) which lies within a group of fields that have the field name 'Whitchley'

attached to them in the tithe apportionment. This is likely to be an asset of limited historic and archaeological interest and of low value.

5.4. **Asset E** is an earthwork complex (MSA14941). It is visible on the ground, in Lidar data and on aerial photographs. It is recorded on the Ordnance Survey base mapping and is recorded as an asset by the historic environment record. The asset is interpreted in the historic environment record as a probably medieval earthwork complex. The fields surrounding the earthwork are recorded on the tithe apportionment as Witchley, Witchley Meadow, Lower Witchley, Big Witchley and Parsons Piece. This raises the question of whether this could be an alternative location for the documented site of a grange of Wombridge Priory '*Wycherley, Wichelle or Hiccholetie*' suggested to lie on the bank of the Bell Brook to the north (D above). The asset has archaeological and historic interest and is of potentially moderate to high value.

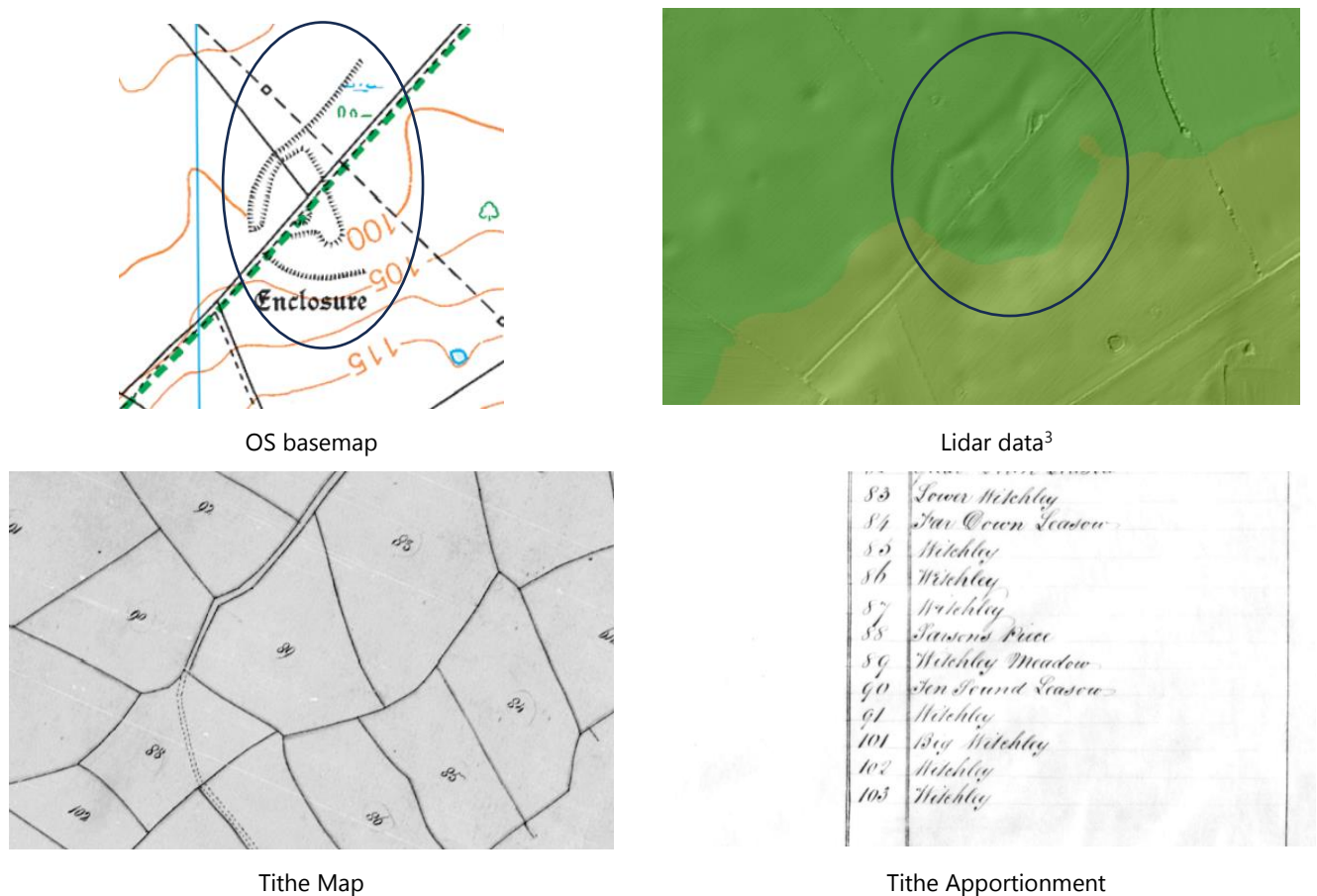


Figure 4: Enclosure

5.5. **Asset group F** is a series of linear cropmarks (MSA13201). The historic environment record notes that on closer examination these are almost certainly field drains. These are therefore of potentially negligible heritage value.

5.6. **Asset group G** is a double ditched enclosure that is visible as a cropmark in aerial images (MSA31502). It is not easily reconciled to any former field boundary, although the field pattern in that location has been significantly modified. It is therefore possible that this represents later

³ https://maps.nls.uk/geo/explore/side-by-side/#zoom=15.0&lat=52.67306&lon=-2.60734&layers=1&right=LIDAR_DTM_1m

prehistoric or Roman settlement activity. The asset has archaeological interest and is of potentially low to moderate value.

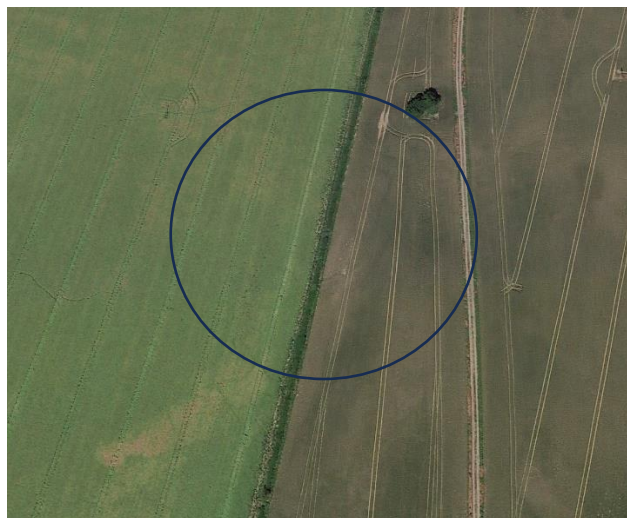


Figure 5: Google Earth, 2018

- 5.7. **Asset group H & I** comprises the site of Beslow Hall (MSA16141), Beslow Farm, Beslow Cottages and the documented site of a medieval chapel (MSA2402). The site includes some standing buildings, including a courtyard farm building complex.
- 5.8. **Asset group J** is the site of Horn Cottage and the extant traditional farm buildings at Horn Cottage.
- 5.9. The above date to the post medieval period and have archaeological, historic and (for the standing buildings) architectural interest. These are common features that are found throughout Shropshire and they are locally significant assets of low heritage value.



Figure 6: Wroxeter Tithe Map (1842) (Beslow Farm)



Figure 7: Uppington Tithe Map (1838) (Horn Cottage)



Traditional farm buildings, Beslow Farm



Traditional farm buildings, Near to Horn Cottage

5.10. **Asset group K** is a holloway, following the course of a road shown on the tithe map. Cottages and gardens are noted on the tithe map and apportionment to the south of the holloway. These are assets that have historic and archaeological interest at a local level and are of low heritage value.



Figure 8: Uppington Tithe Map (1838)

- 5.11. **Asset group L** comprises linear cropmarks and an enclosure (marked below) indicative of settlement activity or agricultural practice from the Iron Age, Roman period or later (MSA108). The asset has archaeological interest and is of potentially moderate value.



Figure 9: Google Earth 2018

- 5.12. **Asset group M** is the course of Watling Street, the course of a Roman road leading into Wroxeter, now the modern B5061. Various investigations have identified preserved remains of Roman road construction within the road corridor. The asset has archaeological interest but the condition is likely to be poor and therefore the asset is likely to be of low value.
- 5.13. **Asset group N** is possibly associated with a ploughed out Bronze Age barrow. The historic environment record records an earthwork, however the asset is not visible on lidar data or aerial photographs. A kink in the parish boundary respects its position, suggesting that historically an earthwork or natural feature was present at this location. The asset has archaeological interest. However as little evidence survives for this feature it is likely to be of low or negligible value.

Archaeological potential

- 5.14. The historic and archaeological context of the Site indicates a high potential for as yet unknown archaeology relating to Iron Age/ Romano-British period activity. This could include evidence for settlement activity as well as field systems and agriculture.
- 5.15. There is also a high potential for as yet unknown archaeology relating to the medieval and post medieval landscape surrounding the settlements at Wroxeter, Donnington, Uppington and Beslow. It is likely that agricultural activity and potentially outlying settlement activity, associated with the documented settlements recorded above is present within the Site.

The settings of designated heritage assets close to the Site

- 5.16. The majority of designated heritage assets within the wider study area are separated from the Site by the intervening topography and mature trees and woodland and therefore lack intervisibility with it. The settings of these assets do not therefore include the Site. This includes the registered park and garden at Attingham and listed buildings in Donnington.

SM1 Wroxeter Roman Town

- 5.17. The scheduled monument of the Roman Town of Wroxeter, defined by the former Town Wall, lies to the west of the Site. The setting of the monument is formed by the later village of Wroxeter and the agricultural landscape that surrounds it. Archaeological research indicates that there was a landscape of farmland and farmsteads surrounding the Roman town and supplying it with food and other commodities. This rural hinterland is an important part of understanding the location of Wroxeter, and its origins within the tribal lands of the Cornovii. The subsequent abandonment of the town, its depopulation and refocusing of the settlement pattern is also evident in the relationship between the urban area of Wroxeter and the land that surrounds it. Although the field pattern and settlement pattern within this rural hinterland has changed since the height of the Roman occupation, it makes a strong positive contribution to understanding and appreciating both the historic importance of the Roman town and its relationship to the rural hinterland that supported it, and the subsequent history of Wroxeter as an abandoned Roman settlement.
- 5.18. The Site lies, in part, within this setting. However, the topography and intervening hedgerows limit intervisibility between the monument and the Site, and the strong contribution made by setting to the heritage value of the asset diminishes with distance from it, meaning that the greatest contribution is made by land immediately surrounding the monument while parts of the Site are more distant and not within the asset's setting at all.

LB1 (1273575) Church of the Holy Trinity, Uppington, Grade II* listed building

- 5.19. The church of the Holy Trinity at Uppington sits in an elevated location that allows for views across the surrounding countryside. As a parish church serving a rural community and a building designed to be visually prominent, these views make a positive contribution to appreciating the church's heritage value. When Uppington Church was restored in 1885 a grey sandstone Roman Alter was found, now a grade II listed building within the churchyard. This suggests that there were historic links between Uppington and Wroxeter, both lie on Bell Brook and Watling Street runs to the north of Uppington before reaching Wroxeter.
- 5.20. The association between the church and village of Uppington and views over the wider landscape including towards Wroxeter are then within the setting of this asset and make a positive contribution to understanding its heritage value.
- 5.21. The eastern extent of the Site lies partially within this setting. Again, the topography and intervening mature trees and hedgerows are such that intervisibility between the monument and the Site is restricted and reduces with distance, so that the Site is largely outside of the asset's setting. A row of pylons is visible from the edge of the churchyard, after which the land falls towards the Severn valley.

6 Constraints and opportunities

- 6.1. The above assets lie within or close to the Site and are both a constraint and opportunity in terms of potential development options.
- 6.2. The masterplan has been carefully considered in response to these assets and the built form of the development designed to avoid the majority of the known assets within this study area. Notably, the following constraints have informed the design development as currently proposed:
- Asset groups A, B, C, and D are all outside of the built form of the development illustrated by the masterplan. As such, the Roman Aqueduct and cropmarks associated with the Roman settlement in and around the Roman town of Wroxeter are preserved in situ;
 - Asset group E is also avoided as this could be the site of a medieval grange, the masterplan has been amended to ensure that the enclosure is preserved in situ; and
 - The cropmarks at Asset groups G and L can also be protected 'in situ' through design refinement and strategic use of open space within the masterplan proposals.
- 6.3. In addition, these assets would be placed within the areas of parkland creation and rewilding which removes them from intensive agricultural activity and ploughing. This would deliver considerable heritage benefits. These are recognised benefits, set out in recent guidance provided by Historic England⁴ which states that "*The best way to protect a ploughed archaeological site is to remove it from cultivation. Instead of cultivation, consider putting it down to permanent grass or long-term, non-rotational set-aside. This can also help to reduce soil erosion and provide a wildlife habitat.*"
- 6.4. Planning practice guidance⁵ defines heritage benefits as including "reducing or removing risks to a heritage asset".
- 6.5. Further opportunities presented by the proposed creation of parkland/ rewilding in the hinterland of Roman Wroxeter include:
- Better understanding of the associated features that no longer have any above ground signature, such as using soft landscaping to demark the course of the Roman Aqueduct while ensuring that it is preserved in situ;
 - Creating a natural buffer to the Roman town that retains and improves its setting. Wroxeter is experienced as a rural settlement that was abandoned after the Roman withdrawal and not reoccupied. Retaining the isolated and rural character of the monument's surroundings preserves a key element of its special interest; and

⁴ <https://historicengland.org.uk/advice/technical-advice/monuments-and-sites/management-of-archaeological-sites-on-arable-land/>

⁵ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment> (paragraph Paragraph: 020 Reference ID: 18a-020-20190723)

-
- Creating a link between the new settlement at Beslow and the Roman town and publicly accessible areas within the Roman town's hinterland, better revealing the significance of the hinterland around the Roman settlement to a wider audience.
- 6.6. Asset groups H, I and J, traditional farm buildings at Beslow, are retained in situ and conserved. This retains these traditional buildings in a viable use; they are currently unsuitable for modern farming and they are currently under used in the current farming regime.
- 6.7. Asset group K is retained within the masterplan as a right of way, this conserves a feature of the historic landscape pattern within the site. Mature trees and hedgerows within the Site are preserved where reasonably practicable, which (along with the retention of traditional buildings, as outlined above) reflects the historic landscape character in the proposed masterplan.
- 6.8. Asset groups F, M and N are unlikely to represent significant archaeology and are therefore not considered as a constraint to the development proposals. However, these illustrate the opportunity to better understand the heritage of the Site through field survey and mitigation, outlined further below.
- 6.9. The settings of Wroxeter Roman Town and All Saints Church at Uppington have also been taken into account in developing the current masterplan. The topography of the of Site and the extent of the settings of these assets has informed the extent of the built form. A large buffer is allowed for in relation to both assets so that the landform allows for their settings as currently experienced to be largely preserved. Refinement of the landscaping proposals, informed by further assessment, would also allow for views between the Wroxeter and All Saints Church and the Site to be filtered to address any harm that could arise as a result of development within the settings of these assets.

Further surveys and mitigation

- 6.10. The following surveys are advised, to inform any future planning application for the Site. The recommended approach is for staged surveys, with each stage informing the scope of the next:
- 6.10..1. It is recommended that a detailed desk-based assessment, map regression, aerial photography and Lidar assessment, and walkover survey are undertaken to support further design refinement and the development of a strategy for archaeological field surveys within the Site;
 - 6.10..2. Geophysical survey is recommended on a Site-wide basis to provide a non-intrusive survey examining the archaeological potential of the Site. This could be augmented by UAV Multispectral Imaging and Geochemical Sampling, remote survey techniques that also inform the archaeological potential of a study area; and
 - 6.10..3. Intrusive surveys as needed to inform the masterplan and design a suitable strategy for archaeological mitigation. This could be undertaken on a strategic and targeted basis as a later stage of assessment.

6.11. It is recognised that even with the best endeavours to avoid known heritage assets within the Site, the Site has a high potential for as yet unknown heritage assets to be present. It is also recognised that not all of the known archaeology within the Site would warrant preservation in situ. A programme of archaeological mitigation, ensuring both the safeguarding of assets warranting preservation in situ, and (where preservation in situ is not warranted) also allowing for an appropriate programme of archaeological recording, post excavation analysis, report and public dissemination would be required as a condition of any forthcoming planning consent.

7 Conclusion

- 7.1. The Proposed Development has the potential to impact buried archaeology during the construction phase. There is also potential for effects on heritage assets resulting from changes to their settings. Shropshire Council has advised, in the Sustainability Appraisal, that due to the potential for, in their view, substantial negative impacts relating to development within the setting of Wroxeter Roman Town scheduled monument and on non-designated cropmark evidence within the site, the site should not be allocated.
- 7.2. However informed and iterative masterplan development has allowed for significant known archaeology within the Site to be retained in situ and conserved within the proposals. The proposals go further in allowing for significant heritage benefits through the positive management of archaeological features within areas of proposed parkland and rewilding. Links between the Site and the Roman town would allow for the hinterland to be better understood and more accessible.
- 7.3. The ongoing design refinement could be further informed by a programme of desk-based assessment and non-intrusive surveys to better understand the archaeological potential of the development site.
- 7.4. Further landscape studies could augment existing proposals to ensure that any impacts on the settings of Wroxeter Roman Town Scheduled Monument and All Saints Church Uppington Grade II* listed building are minimised. In NPPF terminology these are both 'assets of the highest significance' (NPPF paragraph 206(b)).
- 7.5. With the above in place, substantial harm is not predicted in relation to any designated heritage asset. Therefore, the current proposals are consistent with the policy requirements of the NPPF set out in Section 16, including at paragraph 203; paragraph 207 would not be engaged, the balance required by paragraphs 208 and 209 would be relevant to future planning decisions.
- 7.6. Policy DP24 of the local plan would also be engaged. Again this does not preclude development affecting heritage assets. In this case, the proposal particularly aim to address heritage assets positively and are therefore consistent with the provisions in Section 6 of Policy DP24 Encouraging development which delivers positive benefits to heritage assets: "Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition".
- 7.7. The current proposals allow for land in the setting of Wroxeter to be rewilded improving its appearance as a natural buffer to the abandoned Roman town. This also allows for archaeological assets currently at risk of being in poor condition as a result of intensive agricultural activity to be conserved. Built heritage assets within the Site would be conserved within the scheme, these are currently unsuitable to modern agricultural uses and in a poor condition.

-
- 7.8. The concerns raised by Shropshire Council in the Sustainability Appraisal, were noted as "*Site likely to have a substantial negative impact on setting of the Scheduled Monument of Site of Roman town of Wroxeter (Viroconium) (NHLE ref. 1003705). Number of known cropmark sites which may be associated with the Roman city situated within site boundary, whilst very large size of site and proximity to Wroxeter suggests it otherwise has high archaeological potential.*"
- 7.9. The updated master plan proposals address these concerns by including the following measures:
- A large buffer between the Site and Wroxeter is included, such that any resulting harm would be less than substantial;
 - Cropmark sites which may be associated with the Roman town are preserved in situ, and heritage benefits delivered through their removal from ploughing, and the opportunity to provide improved interpretation and links between these assets and the Roman town;
 - The acknowledged high archaeological potential of the site can be further assessed and mitigation delivered through either localised design refinement or archaeological recording.
- 7.10. In conclusion, the proposals can be considered, in relation to the historic environment, technically deliverable and policy compliant.

8 References, glossary and abbreviations

Time periods used are as follows:

- Prehistoric: 500,000 BC - AD 43
- Roman (Romano-British): AD 43 – 410
- Early medieval: 410 - 1066
- Medieval: 1066 – 1540
- Post medieval: 1540 - 1901
- Modern: 1901 - present

Abbreviations used are as follows:

- LB – Listed Building (LBII – Grade II listed, LBII* - Grade II* listed)
- HER – Historic Environment Record
- NDHA – Non-designated heritage asset
- SM – Scheduled Monument

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Appendix A: Gazetteer of heritage assets



Figure 10: Designated heritage assets within 1km study area

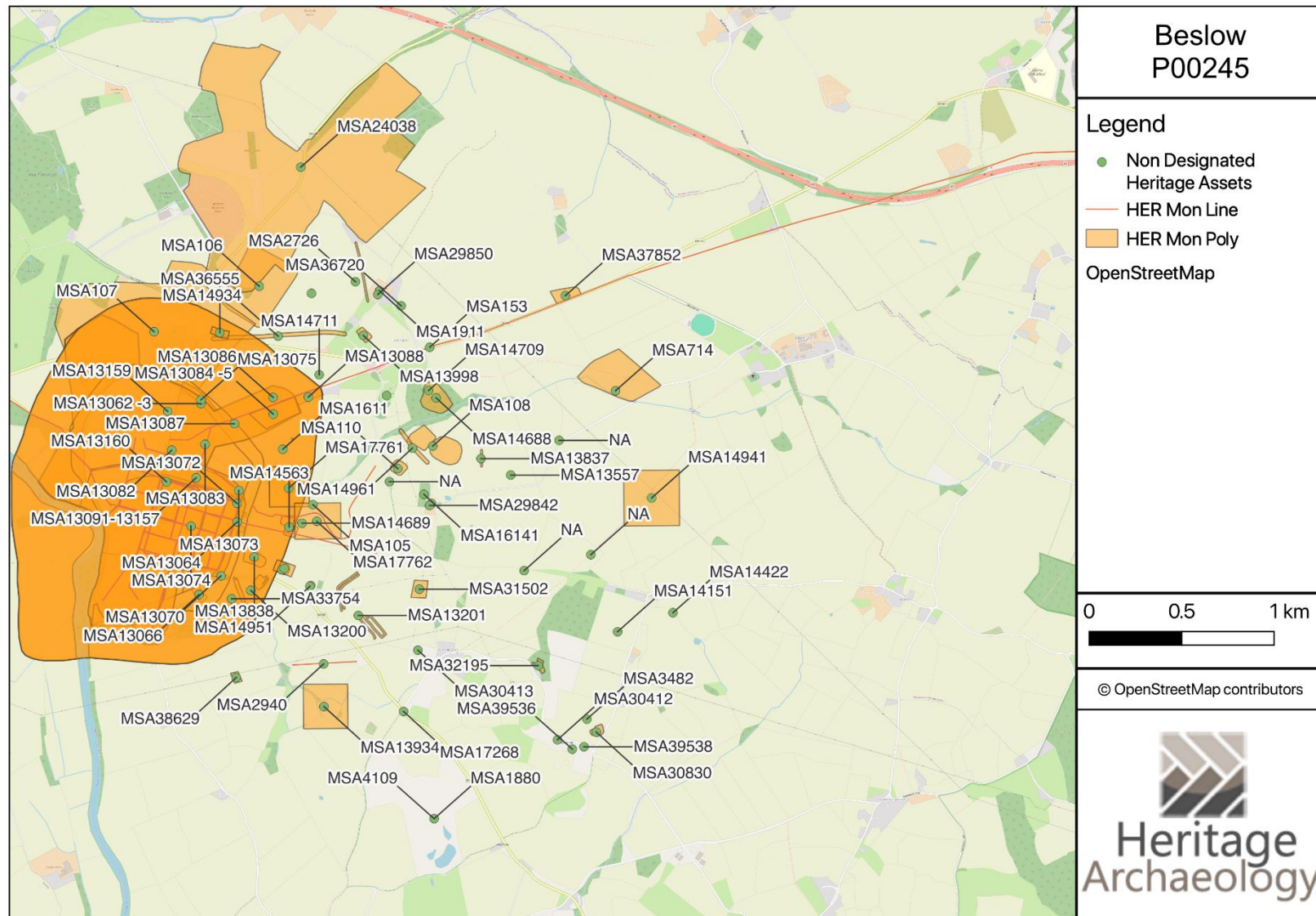


Figure 11: Non-designated heritage assets

Table A1: Designated heritage assets

Reference	Name	Easting	Northing	Status
1003705	Site of Roman town of Wroxeter (Viroconium)	356571	308746	SM
1003713	Wroxeter Roman fort	356303	307596	SM
1224775	CHURCHYARD GATES GATE PIERS AND APPROXIMATELY 3 METRES OF FLANKING WALLS APPROXIMATELY 10 METRES TO WEST OF WEST TOWER OF CHURCH OF ST ANDREW	356297	308240	LB II
1224776	FOLLY APPROXIMATELY 30 METRES TO SOUTH WEST OF WROXETER GRANGE	356320	308172	LB II
1223738	DONNINGTON HOUSE	358168	307832	LB II
1224437	Upper Farmhouse	360667	308079	LB II
1224481	GLEBE COTTAGE	356398	308145	LB II
1224001	1 NORTON CROSS ROADS	356707	309656	LB II
1224002	NORTON FARMHOUSE	356669	309503	LB II
1224004	3 RUSHTON	360535	308235	LB II
1224005	MIDDLE FARM COTTAGES	360537	308200	LB II
1224006	UCKINGTON FARMHOUSE	357760	309813	LB II
1224007	THE OLD POST OFFICE	356329	308310	LB II
1224008	CHURCH OF ST ANDREW	356330	308247	LB I
1223167	Former cottage approximately 10 metres to north west of Donnington House	358149	307836	LB II
1223168	Pump approximately 2 metres to north east of former cottage approximately 10 metres to north west of Donnington House	358153	307840	LB II
1239502	AVENUE FARMHOUSE	360013	309490	LB II
1239885	2 UPPINGTON	359806	309421	LB II
1267430	Garden wall adjoining Charlton Hill Manor to east	358803	307370	LB II
1267042	2 AND 3 NORTON CROSS ROADS	356539	309604	LB II
1267043	THE SHOP	356712	309595	LB II
1267044	LOWER FARMHOUSE	360422	308207	LB II
1267045	YEW TREE HOUSE	360577	308185	LB II
1266671	WROXETER GRANGE	356342	308213	LB II
1273575	CHURCH OF THE HOLY TRINITY	359737	309368	LB II*
1273665	NUMBER 1 (TUDOR HOUSE) AND PART OF NUMBER 2	359798	309421	LB II*
1239503	Roman altar approximately 5 metres to south east of nave of Church of the Holy Trinity	359743	309364	LB II

Reference	Name	Easting	Northing	Status
1267155	Charlton Hill Manor	358790	307368	LB II*
1267269	Horse Shoe Inn	357717	309437	LB II
1223166	MILESTONE APPROXIMATELY 600 METRES TO SOUTH WEST OF CHARLTON HILL HOUSE	358360	306887	LB II
1001114	ATTINGHAM PARK	355844	309613	RPGII*

Table A2: Non-designated heritage assets

MonUID	Name	Easting	Northing
MSA105	Wroxeter Aqueduct, Linear ditch following contours of Bell Brook into Wroxeter Roman City showing on 1890 OS map	357360	308700
MSA106	Wroxeter Marching Camp B (Norton 2), Temporary marching camp of Roman date, with the excavated eastern defences comprising a ditch with a slot in the bottom	357080	309880
MSA107	Cropmark complex around Norton, Multi-period cropmark complex consisting enclosures, drove road, and field systems around Norton Farm, Norton.	356510	309640
MSA108	Single ditched, sub rectangular cropmark enclosure at Beslow, Single ditched, sub rectangular cropmark enclosure of probable Iron Age to Roman date. A second enclosure with rounded corners is visible to the southeast.	358010	309010
MSA110	Rectilinear cropmark enclosure, Beslow, Rectilinear cropmark enclosure of probable prehistoric to Roman date, with an opening at the north east corner.	357820	308890
MSA13062 -3	Excavations on Wroxeter defences (1862)	356760	309250
MSA13064	Excavation on Wroxeter defences (1936)	356950	308610
MSA13066	Excavated section of Wroxeter defences	356740	308220
MSA13070	Excavation of town defences at Fingerpost Cottage, Wroxeter (Insula 14)	356860	308320
MSA13072	Excavation on defences of legionary fortress, Wroxeter (1975)	356950	308710
MSA13073	Excavation of Wroxeter defences and ?aqueduct (1975)	356960	308780
MSA13074	Legionary fortress defences component, Wroxeter	356700	308590
MSA13075	Excavation of section at NW angle of Wroxeter defences (1991-2)	356760	309270
MSA13082	Find Spot before 1872 of a Roman coin hoard at Horseshoe Lane, Wroxeter	356600	309000
MSA13083	Wroxeter, Insula 16 and north-east area inside defences	356780	309030
MSA13084 -5	Middle Crows Green cemetery, Wroxeter, The principal cemetery of the Roman town of Wroxeter. Excavations in 1861-2 found a broken tombstone and the site of a possible mausoleum, together with a number of interments and cremation burials laid out in rows .	357150	309190
MSA13086	Wheatfield cemetery, Wroxeter	357150	309280

MonUID	Name	Easting	Northing
MSA13087	Cunorix tombstone, outside Roman defences, Wroxeter	356940	309140
MSA13088	Excavation at Middle Crows Green Cemetery, Wroxeter (1973)	357340	309280
MSA13091-13157	Excavations, Wroxeter	356730	308850
MSA13159	Extramural occupation, early civilian settlement, Wroxeter	356580	309210
MSA13160	Extramural Occupation, Wroxeter Civitas Capital	356570	308830
MSA13200	Trackway c 150m W of The Wythyns	357020	308240
MSA13201	Cropmarks of linear features c 150m E of The Wythyns	357600	308100
MSA13557	Earthwork c 490m NW of Beslow, Ploughed out? Round barrow of Bronze Age date, previously visible as an earthwork.	358430	308850
MSA13837	Cropmarks of a ditch c 350m NE of Beslow	358270	308940
MSA13838	Rectangular cropmark Enclosure	357040	308420
MSA13934	Cropmarks of an enclosure c 520m W of Ivy House	357410	307610
MSA13998	Cropmark enclosure c.260m SE of Uckington	357640	309610
MSA14151	Find Spot before 1882 of Roman coins and vase in Uppington.	359000	308000
MSA14422	Find Spot in 1983 of a bronze cube at Meadow Farm.	359300	308100
MSA14563	Enclosure to the E side of Wroxeter	357230	308580
MSA14688	Cropmarks c 500m E of White Gates	358030	309270
MSA14689	Find Spot before 1992 of a Donside Terret near Wroxeter.	357300	308600
MSA14709	Finds in 1995 of Roman material suggesting a Roman villa SE of Uckington	357990	309310
MSA14711	Find Spot c1995 of a flint thumb scraper near Wroxeter.	357400	309400
MSA14934	Former Road Line E of Norton	357180	309610
MSA14941	Earthwork complex c1km SW of Uppington	359190	308720
MSA14950	Circular Enclosure c400m E of Wroxeter Defences	357190	308350
MSA14951	Circular Ditch c500m SE of Wroxeter Defences	357340	308260
MSA14961	Linear Feature N of Beslow	357900	309000
MSA153	Watling Street, east of Wroxeter	357998	309543
MSA1611	Middle Crows Green Enclosure, Circular enclosure of probable Iron Age to Roman date	357200	309000
MSA16141	The site of Beslow Hall, A probably late 16th century house, described as one of the county's finest houses. Demolished in 1985.	357960	308750
MSA17268	The site of a former Toll House on B4380, Donnington, The site of an 18th/19th century toll house, since demolished	357840	307580

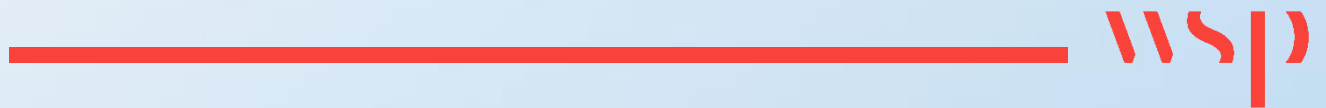
MonUID	Name	Easting	Northing
MSA17761	Linear Feature c500m W of Beslow Cottages	357230	308790
MSA17762	Remains of Field System c400m SW of Beslow Cottages	357380	308610
MSA1880	Possible deserted medieval settlement at Siwaldston, Documentary evidence for deserted settlement of medieval date.	358000	307000
MSA1911	Grange at Uckington	357730	309850
MSA2402	Beslow Chapel, Site of a Chapel of medieval date.	358000	308700
MSA24038	Site of RAF Atcham (USAAF Station 342), Structural and possible below ground remains of a World War II airfield.	357310	310520
MSA2726	Linear cropmark, Uckington, possibly not of archaeological origin	357600	309900
MSA2940	Donnington, Double ditched cropmark linear feature, possibly a trackway of unknown date.	357410	307840
MSA29842	Beslow Farm, Beslow Farm, largely from the digital version of the c.1900 OS large scale mapping.	357990	308690
MSA29850	Uckington Farm	357720	309830
MSA30412	Charlton Hill Farm	358670	307420
MSA30413	Donnington Farm	357920	307910
MSA30830	Quarry and reservoir SW of The White House, Rushton	358880	307460
MSA31502	Double ditched sub rectangular enclosure 350m south of Beslow, Double ditched sub rectangular enclosure 350m south of Beslow identified during 2010 aerial photographic survey.	357931	308239
MSA32195	Old Quarry, Charlton Hill	358570	307821
MSA33754	Possible site of Roman Bath House, SE of Wroxeter, The collection of surface finds and the results of a small scale resistivity survey suggest the presence of a bath house building, adjacent to a small stream heading SE of Wroxeter. Fuller survey would be required to verify the exact nature of this building.	356916	308196
MSA3482	Charlton Mill (wind)	358830	307530
MSA36555	Excavated remains of Roman cremation cemetery, NE of Norton, The remains of a cremation cemetery of Roman date, excavated along the route of the Shelton Resilience Scheme pipeline, in 2013.	356865	309632
MSA36713	Site of Atcham Airfield Dispersed Site Number 12, RAF Atcham, Attingham Deer Park	357763	309285
MSA36718	Structural remains of cantilevered pillbox, RAF Atcham, Uckington Farm	357362	309839
MSA36720	Structural remains of Battle Headquarters, RAF Atcham, Uckington Farm	357846	309768
MSA37852	Cropmark of NE corner of possible Roman temporary camp, c.485m SSW of Wheathill Farm, Uppington	358733	309815
MSA38626	Possible pair of cropmark enclosures, c.400m E of Wroxeter defences	357202	308357
MSA38629	Possible rectilinear cropmark enclosure, c.475m NE of Halfway Meadow	356937	307771
MSA39536	Barn, now Coach House and Stable Block apx 15m to W of Charlton Hill Manor, Charlton Hill, Wroxeter	358750	307369

MonUID	Name	Easting	Northing
MSA39538	Barn at Charlton Hill Manor, Charlton Hill, Wroxeter	358813	307381
MSA4109	Charlton Hill Garden, A probable 17th century garden, associated with Charlton Hill House	358000	307000
MSA714	Wicherley Deserted Medieval Village, Wycherley, Wichele or Hiccholetie was a grange of Wombridge Priory. The majority of the features at the site are ridge and furrow and furlong boundaries with a number of later drainage features	359000	309300
NA	Horn Cottage, cottage and barn on historic mapping	358693	309035
NA	Holloway, near Charlton Hill Gorse, with cottages to south depicted on tithe map	358498	308334
NA	Beslow Cottages	357774	308820

End of report

Appendix D

LAND AT SHORE LANE PRE-APPLICATION RESPONSE FROM SHROPSHIRE COUNCIL





Development Services
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

Guy Maxfield
WSP
Level 2
The Mailbox
100 Wharfside Street
Birmingham
B1 1RT

Date: 26th July 2022
My ref: PREAPP/21/00560
Your ref:

For Tom Birtles, Raby Estates

Dear Mr Maxfield,

PRE-APPLICATION ADVICE

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING REFERENCE: PREAPP/21/00560

DEVELOPMENT Proposed Residential Development,

LOCATION: Land off Shore Lane, Cressage, Shrewsbury

I am writing further to your pre-application request dated 26th October 21, our subsequent Teams meeting on 14th February and the amended plans submitted on 13th May 22.

The Raby Estate is seeking planning advice on a proposal for up to 80 new homes on land at and adjoining Shore Lane, Cressage. The proposals would additionally accommodate up to 465m² of employment space, public open space, footpaths, and improvements to highway infrastructure. The site is located south of the A458 and to the immediate west of the settlement boundary of Cressage. It is not within or adjacent to any statutory environmental designations.

The supporting statement advises that the proposals would allow a demographically appropriate housing mix with additional benefits including:

- Safe, accessible and deliverable site
- New and improved pedestrian linkage
- Live/work opportunities
- Promoting healthy active lifestyle

- Encourage sustainable travel
- Delivering biodiversity net gain linked to wider land management
- Electric vehicles and heating friendly

Comments received from Planning Consultees were forwarded to you in advance of our meeting and are reproduced below. Following the consultee comments an amended layout plan was received and is considered in section 3 below.

1. **FINDINGS OF CONSULTATIONS:**

1.1 **SC PLANNING POLICY**

Background

- 1.1.1 The preapplication relates to a proposed mixed-use scheme to provide around 80 dwellings and 465sqm of Class E employment space. The scheme would include provision for landscaping, public open space and new highways infrastructure including traffic calming measures and the upgrading of a footpath link between the site and the settlement centre.

Conformity with the Adopted Local Plan

- 1.1.2 The adopted Local Development Plan consists of the Core Strategy (2011), Site Allocations and Management of Development (SAMDev) Plan (2015), and any adopted formal Neighbourhood plans. The strategic approach of the Local plan is to focus development within Shrewsbury and named Market Towns, Key Centres, Hubs and Clusters identified within the adopted plan in order to foster stronger social, economic and environmentally sustainable communities.
- 1.1.3 The site subject to this pre-application is located on the edge of Cressage which is not currently identified within the adopted plan as a settlement for new development and is as such for planning policy purposes located within the 'countryside'.
- 1.1.4 Adopted Local Plan Policies and the National Planning Policy Framework (NPPF) sets out criteria for which new residential and employment development in the countryside should be assessed. With specific regard to the adopted Local Plan, Core Strategy Policy CS5 and SAMDev Plan Policy MD7a addresses employment and residential development within the countryside.
- 1.1.5 Policy CS5 of the Core Strategy advises '*New development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt.*' This is reflected within policy MD7a of the SAMDev Plan which advises: '*Further to Core Strategy Policy CS5 and CS11, new market housing will be strictly controlled outside of Shrewsbury, the Market Towns, Key Centres and Community Hubs and Community Clusters.*'
- 1.1.6 As such in accordance with policy CS5 and MD7a, it is expected that new residential development will be limited in the 'countryside' with new market

housing strictly controlled. Economic development is also expected to be limited within countryside locations with a focus on retention and expansion of existing established businesses and conversion or replacement of suitably located buildings for small scale economic/employment generating use. The development proposed within this preapplication is not considered to conform with the types of development envisaged for 'countryside' locations within the NPPF or adopted development plan and the proposed development is contrary to Core Strategy CS5 and MD7a.

Five Year Housing Supply and Housing Delivery Test

- 1.1.7 Part 2 (v) of the SAMDev Policy MD3 reflects the NPPFs presumption in favour of sustainable development and provisions for where there is a lack of five-year supply of housing sites. With regard to Housing Land Supply across Shropshire the published Five Year Housing Land Supply Statement, 2020 concludes that as of 31st March 2020 Shropshire currently has 6.05 years supply of deliverable housing land against the housing requirement within the adopted Core Strategy (2011) and 8.11 years supply of deliverable housing land against the local housing need, calculated using Governments standard methodology.
- 1.1.8 Shropshire has exceeded the housing need over the last 3 years as calculated within the national housing delivery test (156% delivery) and as calculated locally against the housing requirement identified within the adopted Core Strategy (2011) (127% delivery). As such, there is a five-year supply of housing land across Shropshire and the national housing delivery test has been met. It is considered therefore that the relevant adopted plan policies remain up to date.

Local plan review

- 1.1.9 The Draft Shropshire Local Plan (2016-2038) has been through several stages of consultation (Regulation 18 (plan-making) and Regulation 19 (pre-submission)) and subsequently the Draft Shropshire Local Plan was submitted to the Planning Inspectorate for examination on 3rd September 2021.
- 1.1.10 Paragraph 48 of the NPPF sets out factors which effect the amount of weight which can be applied to relevant policies in emerging plans. Taking these into account it is considered that some limited weight can be applied to relevant draft policies within the draft Shropshire Local Plan, as a material consideration in the decision-making process on planning applications. However, this limited weight is significantly reduced where there are any relevant unresolved objections. Ultimately the draft Shropshire Local Plan will only carry full weight on its adoption.
- 1.1.11 Representations have been received during the Regulation 19: Pre-submission Consultation on the Draft Shropshire Local Plan, including a number of unresolved objections. In summary these objections are with regard to the overall strategic approach for Shropshire, including the scoring system used for determining community hubs. In addition, there are unresolved settlement specific objections regarding 1) the proposal to designate Cressage as a hub without further assessment of housing need, 2) infrastructure and facilities available 3) housing numbers for Cressage, 4) objection to the site allocations and 5) the ability of those sites to meet the draft site guidelines. There is also a request within one

representation that the housing guideline for Cressage should be increased and the site subject to this preapplication be allocated as a mixed-use housing and employment site. It is not known at this stage whether the Plan Inspectors will wish to explore these matters further through the Examination. The opportunity to consider the matters raised further through the examination process should not be prejudiced by early approvals.

- 1.1.12 Additionally, like the Adopted Plan, the Draft Shropshire Local Plan is intended to be read and applied as a whole. As such, all relevant draft policy requirements would need to be taken into account where it is proposed that any weight is given to the draft Shropshire Local Plan.

Consideration of the Draft Shropshire Local Plan

- 1.1.13 Cressage is proposed to be identified as Community hub (Draft policies SP2, SP8 and S13.2) with a development boundary. The draft settlement policy for Cressage (S13.2) proposes a housing guideline of around 80 new residential dwellings to be delivered during the plan period. This residential development is proposed to be delivered through new residential site allocations identified in the draft local plan and draft policy maps; appropriate small-scale windfall sites within the settlements development boundary, where it is consistent with the draft community hub policy SP8 and other relevant policies of the draft local plan.
- 1.1.14 The site subject to this preapplication lies outside of the proposed development boundary (Draft policy map S13) and therefore continues to be identified for planning purposes as 'countryside'. The draft local plan proposes that outside of development boundaries of community hubs, new development will be managed in accordance with draft local plan policy SP10 – Managing Development in the Countryside. The draft policy SP10 is similar to the adopted plan policies CS5 and MD7a, seeking to direct the majority of new development to the Strategic, Principal and Key Centres and new Strategic settlement. Within the rural area, the Community Hubs and Community Clusters are the focus for new development, and new market residential development in the countryside outside of the development boundaries will be strictly controlled. With regard to employment, proposals are expected to be small scale diversifying the rural economy and maintaining or enhancing the countryside vitality and character.
- 1.1.15 Draft Policy SP7 – Managing Housing Development, at paragraph 4, states that additional market housing development outside the settlement boundaries will be strictly controlled in line with draft policy SP10 (discussed above). The paragraph goes on to confirm that such development will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the settlement policies.
- 1.1.16 There is currently insufficient evidence to demonstrate that the residential guidelines couldn't be achieved through the delivery of the proposed allocated site and windfall development within the development boundary. The accompanying planning statement with this preapplication enquiry reiterates a number of the objections raised by the applicants within their regulation 19 response which the

Local Plan Inspectors may want to consider during the Local Plan Examination process and as stated this opportunity should not be prejudiced through early approval. As such there is a need to consider whether there are other specific material considerations which may weigh in the balance of decision making in relation to the delivery of sustainable development.

Other relevant draft policies

1.1.17 As already specified, the draft Shropshire Local Plan is intended to be read and applied as a whole and in addition to assessment of material considerations there is also a need to consider and demonstrate conformity with the wider policies of the draft Shropshire Local Plan. In this case this would include the following Draft Policies which introduce additional policy considerations:

- The settlement guidelines in draft Policy S13.2
- Draft Policy SP3: Climate Change
- Draft Policy SP5: High Quality Design
- Draft Policy SP6: Health and Wellbeing
- Draft Policy DP1: Residential Mix
- Draft Policy DP2: Self-Build and Custom-Build Housing
- Draft Policy DP3: Affordable Housing Provision
- Draft Policy DP11: Minimising Carbon Emissions
- Draft Policy DP12: The Natural Environment
- Draft Policy DP14: Green Infrastructure
- Draft Policy DP15 Open Space and Recreation
- Draft Policy DP16: Landscaping of New Development
- Draft Policy DP18: Pollution and Public Amenity
- Draft Policy DP20: Water Efficiency
- Draft Policy DP21: Flood Risk
- Draft Policy DP22: Sustainable Drainage Systems
- Draft Policy DP27: Broadband and Mobile Communication Infrastructure

Conclusion

1.1.18 The adopted Local Plan is the starting point for decision making. Cressage is currently identified as countryside for planning policy purposes. Any new development is as such subject to adopted local plan policies CS5 and MD7a, which alongside the NPPF set out the criteria which limits new residential development in the countryside.

1.1.19 Shropshire Council considers that there is a robust five-year housing land supply in Shropshire and the housing delivery test has been met in Shropshire and therefore relevant policies remain up to date.

1.1.20 Reflecting on the relevant considerations within Paragraph 48 of the NPPF, it is considered that some limited weight can be applied to relevant draft policies in the draft Shropshire Local Plan, as a material consideration in the decision-making process on planning applications. However, this limited weight is significantly reduced where there are any relevant, substantial unresolved objections, which is the case for Cressage.

- 1.1.21 The draft Shropshire Local Plan should be read and applied as a whole, as such, there is a need to consider the conformity of proposals with wider policies of the draft Shropshire Local Plan. Particularly pertinent draft policies are noted above.
- 1.1.22 Cressage is proposed to be a community hub with a development boundary within the draft Shropshire Local Plan, however the site subject to this preapplication would remain excluded and for planning policy purposes continue to be classed as countryside where new market housing is proposed to continue to be strictly controlled to accord with draft plan policy SP10 and the objectives of the NPPF.
- 1.1.23 There are unresolved objections through Regulation 19 consultation with regard to the overall strategic housing strategy and settlement specific objections and the opportunity for these matters to be assessed within the local plan examination should not be overruled, particularly at this stage where the main matters for consideration are not yet known.
- 1.1.24 It is considered that any proposals for this site would need to demonstrate other significant supporting material considerations, together with compliance with all emerging policy requirements within the draft Shropshire Local Plan.

1.2 SC HIGHWAYS (comments prior to amended layout plan)

- 1.2.1 The site benefits from direct access on to A458 and therefore from a capacity perspective any additional vehicular trips are likely to be able to be accommodated by the surrounding highway network. However, it has not been demonstrated that acceptable access can be provided. In addition, whilst the application has sought to provide pedestrian connectivity between the site and local amenities, it is not considered that these proposals are acceptable and are suitable for all users. Therefore, based on the information submitted, we could not support any proposed development at this location unless further information and proposals are put forward to mitigate the impact of the development and it can be demonstrated that a satisfactory access can be provided.
- 1.2.2 In response to the Transport and Highways Strategy submitted we would offer the following comments at this time;
- i. Section 3.3 Accident Data. Whilst it is acknowledged that Covid has had an impact on statistics, this information needs to be updated in the event that a formal planning application is submitted.
 - ii. Figure 4.1 seeks to provide an overview of the pedestrian infrastructure within the vicinity of the site and acknowledges that the footway widths along the A458, which is being promoted as a pedestrian route to and from the site are 1.5 metres or less in width. It is not considered that this a suitable pedestrian route and does not meet the minimum requirements for footway widths. The A458 is a main route within Shropshire and is therefore used by HGV'S. The proposed development would lead to an intensification of the existing footpath route and could potentially compromise the safety of all road users, particularly vulnerable users. It is noted that whilst reference is made

to possible widening of this route, it can only be provided where Raby Estates are in control of the adjoining land, which would not provide a continuous acceptable width.

1.2.3 Section 5.2.2 states the following:

The constraints of a vehicular access arrangement into the site from the A458 Shrewsbury Road have been considered and identified below:

- *Visibility restrictions due to the mature trees and lack of footway provision on the south side of the A458 Shrewsbury Road carriageway;*
- *Discussions with the Trees Department at Shropshire Council found that the three mature trees have a Tree Protection Order (TPO) attached to them, although there is no information available on the Capital Asset Valuation of Amenity of Tree (CAVAT); and*
- *Land ownership constraints along the road frontage.*

1.2.4 Appendix A Drawing no - J32-4463-PS-001 provides an indicate access arrangement, which does not include details of the location of any trees within the vicinity of the site entrance. The Indicative Masterplan drawing shows that at least two trees are within the visibility splay and would therefore need to be removed to create a satisfactory access to the site.



1.2.5 A proposed visibility splay of 2.4 metre by 43 metres is suitable for vehicle approach speeds of 30mph. As acknowledged within Section 5. 2.7 vehicle speeds are likely to be higher than 30mph speed limit and therefore traffic calming measures would be required or a greater visibility splay provided.

1.2.6 An Indicative Masterplan has been submitted in support of the pre-application enquiry. We would make the following observations that should be considered in the event a formal application is submitted:

- i. It is considered that the proposed development seeking access directly to the principal road A458, should have more of an open frontage, rather than hidden behind the existing hedging/vegetation. This is to ensure the houses are visible to passing traffic, as well as displaying a more active frontage. This would create some necessary “side friction” (MfS) to improve the local situation. By encouraging appropriate passing traffic behaviours (slower speeds). As well as providing a more conducive environment to the use of active and sustainable travel modes (walking, cycling, mobility scooter, etc.)
- ii. It is unclear from the Masterplan submitted if vehicular access will also be provided on to Shore Lane. It would appear that at least two plots are proposed to have direct access from Shore Lane. It is considered that the development would benefit from a specific pedestrian/cycle linkage to Shore Lane, which could also act as an emergency vehicle link. Again, consideration will need to be given to improving Shore Lane between the access and the A458, to ensure appropriate driver behaviour and encourage active movements by the future residents.

1.2.7 Any future application should provide further details of the pedestrian link between the site, across Shore Lane and on to the A458. Consideration should be given to pedestrian and cycle safety along the route, and the connection on to the A458.

1.2.8 Specific consideration should be given to providing adequate Sustainable Drainage, within the site. It should be noted that the Shropshire Council advice on adoptable highway infrastructure has recently been amended and should be considered within any future submission for planning consent (<https://shropshire.gov.uk/roads-and-highways/developing-highways/design-standards/>) Also, it is recommended that early negotiations are entered into with Shropshire Council to facilitate acceptance of any proposed adoptable infrastructure and to secure the appropriate legal agreements.

1.3 LANDSCAPE ADVISOR

1.3.1 The various elements of the proposed development will lead to a range of landscape and visual effects, some of which have the potential to be beneficial. Direct landscape effects may be predicted as a result of the impact of new built form, access, landscape proposals and increased human activity. Receptors for these are likely to be the topography and the vegetation of the site, notably the mature and veteran trees and hedgerows.

1.3.2 The site lies within the Estate Farmlands LCA and is a short distance from the Riverside Meadows LCA. The characteristic elements of these LCAs within a defined study area for the assessment of effects will need to be identified and effects on the landscape character of these areas assessed.

- 1.3.3 Other than 2 public footpaths in the south east corner of the site there appears to be no public access to the proposal site or land to the north, west and south west for some distance. Visual effects are likely to be experienced by users of these footpaths, the A458, minor roads and public footpath to the south, and by residents in nearby dwellings. Section 13 (Landscape, Visual Impact and Amenity) of the planning statement appropriately references the Shropshire Landscape and Visual Sensitivity Assessment and parcel 30CSG-B within which the site lies. The open and elevated views and high levels of susceptibility of some visual receptors are noted in the description of parcel 30CSG-B and these will need to be considered in the assessment of visual effects, as will the potential for visual effects from the Shropshire Hills AONB which lies some 1.75 km to the east.
- 1.3.4 These effects will need to be fully considered in a landscape and visual appraisal/landscape and visual impact assessment undertaken by a suitable experienced chartered landscape architect in compliance with GLVIA3 and supporting Technical Guidance Notes. The assessment will need to be accompanied by a landscape/mitigation strategy which addresses any adverse effects and contributes to local distinctiveness and high quality placemaking.
- 1.3.4 The landscape masterplan shown on drawing 1149 04 offers the potential to retain valued landscape elements and improve access to the countryside. The disposition of open space appears appropriate, and subject to the effective connection of a landscape strategy to the landscape and visual effects identified in the LVA/LVIA, the masterplan appears to be appropriately considered.

Rupert Dugdale
Principal Landscape Architect
ESP Ltd 13 December 2021

1.4 SC ARCHAEOLOGY

- 1.4.1 The proposed development site comprises a c.5.66ha area of agricultural land on the western edge of the historic village of Cressage. At present the Shropshire Historic Environment Record (HER) contains no record of any archaeological features on the proposed development site. However, Environment Agency LiDAR data indicates that earthwork remains of ridge and furrow are present in at least two of the fields within which the proposed residential development would be located. Given the size of the proposed development site it is considered that there is also potential for currently unknown archaeological features and deposits to be present. For this reason, it is considered to have moderate-high archaeological potential.
- 1.4.2 It is considered that the Desk Based Heritage Assessment by RPS Group dated February 2013 continues to provide sufficient information regarding to archaeological interest of the proposed development site in relation to the requirements of Policy MD13 of the Local Plan and Paragraph 194 of the NPPF (July 2021). In particular, we concur with its findings regarding the archaeological potential of the proposed development site.

- 1.4.3 To supplement this information it is, however, advised that the results of an archaeological field evaluation, comprising a geophysical survey of the proposed development site, should be submitted as part of any planning application. Thereafter, in line with Policy MD13 of the Local Plan and Paragraph 205 of the NPPF (July 2021) and subject to the results of the geophysical survey, it may be necessary to advise that phased programme of archaeological work be made a condition of any planning permission. This would consist of an initial targeted trial trenching exercise, followed by further mitigation as appropriate. An appropriate condition would be: -

No development approved by this permission shall commence until the applicant, or their agents or successors in title, has secured the implementation of a phased programme of archaeological work in accordance with a written scheme of investigation (WSI). This written scheme shall be approved in writing by the Planning Authority prior to the commencement of works.

Reason: The site is known to hold archaeological interest.

1.5 SC CONSERVATION

- 1.5.1 This formal Pre-application enquiry relates to a mixed use development scheme where the proposed development site is positioned on the western edge of the historic settlement of Cressage. We would advise that the following policies relevant to the historic environment would be applicable to this type of development proposal: Local Shropshire Council Core Strategy policies CS5 (Countryside and Greenbelt), CS6 (Sustainable Design and Development) and CS17 (Environmental Networks), SC SAMDEV policies MD2 (Sustainable Design), MD7(a) (Managing Development in the Countryside) and MD13 (The Historic Environment), and national policies and guidance including the National Planning Policy Framework (NPPF) as recently revised and relevant Historic England Guidance including GPA3 'The Setting of Heritage Assets'.
- 1.5.2 As noted on pages 23-24 of the Planning Statement submitted with this Pre-application submission, there are a number of designated heritage assets near to the proposed development site as well as a number of non-designated heritage assets evident when referring to historic OS mapping and current mapping overlays, and as such, in addition to the relevant policy considerations noted above, legislatively Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 would be relevant where special regard to the preservation of listed buildings and their settings is required. A subsequent formal planning application should address the requirements of the NPPF and local plan policies in terms of providing sufficient information to understand the level of impact of the proposed development on the significance of any nearby heritage assets including their setting, where the advice found in Historic England Advice Note 12 is relevant, and in this regard a proportionate heritage impact assessment should form part of the submission documents should a planning application follow, where the scale, layout, grain and pattern of development, appearance, design and detailing, and external materials and colour finishes of dwellings, buildings and boundary treatments and access details are all relevant considerations with respect to historic environment matters. Please also note the comments from the

Archaeology half of our Team. Conservation Case Officer: Karen Rolfe Date: December 13, 2021

1.6 SC ECOLOGY

1.6.1 The planning application submission should include the following:

- i. Site boundary: The submitted ecological survey does not cover the entirety of the site boundary. For the planning application submission, a survey covering the whole site should be submitted.
- ii. Biodiversity Net Gain: SC Ecology now require Biodiversity Net Gain calculations for all major developments. This must demonstrate an increase in habitat value compared to the pre-development baseline, in accordance with MD12, CS17 and the NPPF. A planning application on this site should be accompanied by information demonstrating biodiversity losses and gains, utilising the DEFRA Metric 3.0 and with accompanying documentation in line with BS 8683:2021 – Process for designing and implementing Biodiversity Net Gain and good practice guidance, i.e. Biodiversity Net Gain – Good Practice Principles for development (CIEEM, 2016). The extent of landscaping should be informed by the biodiversity net gain calculation to ensure an appropriate level of net gain is achieved on site. The development must demonstrate at least a 10% net gain in biodiversity.
- iii. It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision (Government Circular 06/2005). For more information about ecological survey requirements, please refer to Shropshire Council's Guidance Note 1: When is an Ecological Assessment required? <https://shropshire.gov.uk/media/1871/guidance-note-1-when-is-an-ecological-assessment-requiredapril-2014.pdf>

Please note: This pre-application advice does not constitute a formal decision of Shropshire Council in respect of any future planning application(s). No guarantee of a particular decision or even recommendation can be given as any application will contain additional information and will have to undergo a process of consultation which may raise new issues.

Please contact me, or one of the other Ecology team members, if you have any queries on the above.

Sophie Milburn
Planning Ecologist
sophie.milburn@shropshire.gov.uk
Tel.: 01743 254765

1.7 SC TREES

- 1.7.1 Clearly this site has an important arboricultural resource and has protected trees both on site and adjacent to. Other important trees are not currently protected as it has not been expedient previously to do so. See GB and G5 of the Shrewsbury & Atcham Borough Council (Land at Shrewsbury Road, Shore Lane & Crown Lane, Cressage) Tree Preservation Order on plan extract below.
- 1.7.2 The submitted FLAG Baseline Tree Survey has identified 5 Category "A" trees 41 "Cat "B" trees and 54 Cat "C" trees along with groups and hedges on the site. Notably 2 trees have been identified as veteran specimens (Oaks 3001 and 3002) and one classed as ancient (Ash 3004). The indicative layout proposes that the 2 veteran Oak trees are retained in POS with maximum root protection areas (RPA) although this layout fails to clearly show the retention of Ash tree 3004 with protected RPA intact.



- 1.7.3 If the site is deemed to be suitable for development a further application will require the following arboricultural information in line with BS 5837 2012:
- Plan showing proposed tree retentions and removals (Avoidance of any mature tree being within an enclosed garden area);
 - Tree Protection Plan (TPP);
 - Arboricultural Method Statement (AMS) where any RPA's are breached;
 - Management proposals for the veteran / ancient trees present which may not be suitable to be within accessible POS due to condition and hazards associated with this age of tree. These trees require excluded areas for both safety/ wildlife considerations and avoidance of compaction or inappropriate management regimes.

- Schedule of arboricultural supervision prior to and during any approved work on site
- Proposed new landscaping to mitigate for loss of native hedgerows trees and maintenance schedule to ensure successful establishment.

1.8 SC DRAINAGE

1.8.1 The development site is greater than 1 hectare, a Flood Risk Assessment (FRA) should be produced where the developer should:

- Complete a FRA using Shropshire Council's Strategic Flood Risk Assessment (SFRA) documents for guidance. The SFRAs are available on the Shropshire Council website. The criteria for a FRA are set out in National Planning Policy Framework and the Technical Guidance to the National Planning Policy Framework. Reference should also be made to the Environment Agency West Area (Midlands) Flood Risk Assessment Guidance notes. A FRA should include, as a minimum:

- Assessment of the Fluvial flooding (from watercourses)
- Surface water flooding (from overland flows originating from both inside and outside the development site)
- Groundwater flooding
- Flooding from artificial drainage systems (from a public sewerage system, for example)
- Flooding due to infrastructure failure (from a blocked culvert, for example)
- Flood compensation storage, finished floor levels and evacuation plan should be detailed.
- Proposed surface water drainage strategy

1.8.2. The use of soakaways should be investigated in the first instance for surface water disposal. Percolation tests and the sizing of the soakaways should be designed in accordance with BRE Digest 365 to cater for a 1 in 100 year return storm event plus an allowance of 35% for climate change. Full details, calculations, dimensions and location plan of the percolation tests and the proposed soakaways should be submitted for approval. Surface water should pass through a silt trap or catchpit prior to entering the soakaway to reduce sediment build up within the soakaway. Should the use of soakaways prove to be not viable, the use of large diameter pipes and crate storage together with a large number of chambers are likely to prove to be an expensive solution in terms of both construction and maintenance. The site's topography lends itself well to the use of true SuDS.

1.8.3 Opportunities for permeable paving, swales, attenuation basins, filter strips and rain gardens for the highway within the development site which could be explored to make the drainage system more sustainable. Challenges to the viability of SuDS at development sites may include land take/space limitations, land contamination legacy, soil infiltration properties and groundwater conditions. Key to their viability, however, is their early consideration. It could not be accepted, for example, that true SuDS are unviable simply because they do not fit in with a proposed site layout which has been designed prior to the consideration of SuDS.

The 'Management Train Approach' should be central to the surface water drainage strategy of the proposed site. The main objective is treatment and control of runoff as near to the source as possible protecting downstream habitats and further enhancing the amenity value of the site aiming to incrementally reduce pollution, flow rates and volumes of storm water discharging from the site. SuDS should link with the individuals plot structure, planting, public open space requirements and amenity areas, gaining multiple benefits from a limited area of land.

- 1.8.3. Information on the proposed maintenance regime for any sustainable drainage system proposed, including details of who will take responsibility should be provided to ensure that the drainage system remains in good working order throughout its lifetime.
- 1.8.4. Urban creep is the conversion of permeable surfaces to impermeable over time e.g. surfacing of front gardens to provide additional parking spaces, extensions to existing buildings, creation of large patio areas. The appropriate allowance for urban creep must be included in the design of the drainage system over the lifetime of the proposed development. The allowances set out below must be applied to the impermeable area within the property curtilage: Residential Dwellings per hectare Change allowance % of impermeable area Less than 25 10 30 8 35 6 45 4 More than 50 2 Flats & apartments 0

2. PLANNING OFFICER COMMENTS

2.1 Planning Policy

2.1.1 Cressage falls within the area of the Much Wenlock Place Plan. The village is not currently a community hub though it is proposed as a hub under Policy S13.2. of the emerging Shropshire Local Plan which is currently at Inquiry stage. There is no current policy support for residential development within the defined development boundary. This would change if the policy in the emerging plan is accepted, however, the proposed site falls just outside the development boundary as currently defined. The draft policy is worded as follows:

1. Within the Much Wenlock Place Plan Area, Cressage has been identified as a Community Hub. The residential development guidelines for Cressage is identified below: Community Hub Settlements Residential Guideline Around 80 dwellings.
2. Within Cressage, new residential development will be delivered through new residential allocations identified in the Local Plan; appropriate small-scale windfall residential development within the settlements development boundary, as shown on the Policies Map, where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan; and appropriate cross-subsidy and exception development where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.
3. Within Cressage, new employment development will be delivered through appropriate small-scale windfall employment development within the settlements development boundary, as shown on the Policies Map, where it is

consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.

4. Local Plan site allocations within Cressage Community Hub are identified in Schedule S13.2(i) below and identified on the Policies Map. Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan.
5. Development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs.

- 2.1.2 Two sites are put forward as proposed allocations. Land adjoining the Vicarage (CES005) is put forward for 60 dwellings. The access would form a gateway feature for the village with speed restrictions, traffic calming and appropriate pedestrian facilities. Land at The Eagles Public House is put forward for around 4 dwellings (CES006).
- 2.1.3 The current proposal has been put forward by the applicant as an alternative to CES005. It falls outside of the proposed development boundary in the emerging Local Plan (Draft policy map S13) and therefore continues to have the status of 'countryside' in the draft plan, where new development will be resisted or strictly controlled.
- 2.1.4 The above preapplication consultation response by the Council's planning policy team advises that the weight given to emerging policies is reduced where such draft policies are contested and advises that this is the case for the current proposals. The Inspector will determine whether the contested issues with respect to Cressage should be considered at the Plan Inquiry, or whether the proposed spatial policy for Cressage set out in the draft Plan should be accepted as currently worded.
- 2.1.5 The Policy Team emphasises that if the objection on behalf of the Raby Estate is considered at the Inquiry, then any proposals for this site would still need to demonstrate compliance with all emerging policy requirements plus other significant supporting material considerations.
- 2.1.6 The level of compliance with emerging policies is considered below, having regard to the consultee comments listed above and the amendments put forward by the applicant in response to these comments. The extent to which the proposals might be able to offer significant supporting considerations / public benefits is also considered in a succeeding section.
- 2.1.7 It would be inappropriate to make any direct comparison between the current proposals and CES005 in responding to this preapplication request. However, there would be some concerns in terms of infrastructure capacity, amenity / cumulative impact and sustainability if both sites were to be developed within the timescale of the emerging Plan.

3. ENVIRONMENTAL ASSESSMENT

3.1 The proposals must comply with relevant development plan policies and also those of the emerging Shropshire Local Plan. The level of policy compliance can be assessed for individual subject areas with reference to the pre-application consultee responses, having regard to the further information and layout amendments which have subsequently been submitted.

3.2 Access / Highway matters

3.2.1 The Highway Authority response raised concerns on the initial proposals with respect to access and pedestrian linkages. The applicant has subsequently amended the layout plan seeking to address these concerns.

3.2.2 Specifically the Highway Authority has raised the following issues:

- i. They have questioned the adequacy of the access visibility splay of 2.4 metre by 43 metres for vehicle approach speeds of 30mph and above. They advise that traffic calming measures would be required or a greater visibility splay provided.
- ii. They consider that the proposed access onto the A458 should have more of an open frontage, rather than being hidden behind the existing hedging/vegetation. This is mainly to ensure the houses which will generate traffic are visible to passing traffic in order to encourage passing traffic to slow down. This would in-turn provide an improved environment for non-vehicular traffic.
- iii. They advise that the development would benefit from a specific pedestrian/cycle linkage to Shore Lane, which could also act as an emergency vehicle link. Consideration should also be given to improving Shore Lane between the access and the A458, to ensure appropriate driver behaviour and encourage active movements by the future residents.
- iv. They advise that any future application should provide further details of the pedestrian link between the site, across Shore Lane and on to the A458. Consideration should be given to pedestrian and cycle safety along the route, and the connection on to the A458.

3.2.3 The applicant has responded as follows:

- i. It is confirmed that the site will achieve safe access with a carriageway width of 5.5m and a radius of 6m, and footways either side along the site frontage with a width of 2m. Removal of 5 trees on the highway frontage within the Raby Estate ownership would secure the visibility splay.
- ii. The cover letter accompanying the amended plans dated 13/05/22 advises that the pavement would continue at 2m wide along the extent of the Raby Estate land ownership. The layout plan (revision 4) shows that the footpath

does not extend to the east and west of the site frontage. There is however a continuous footpath link a minimum of 0.5m wide to the health centre and the Eagles Public House on the north side of Shrewsbury Road. An uncontrolled pedestrian crossing is proposed to link to this.

- iii. A pedestrian route is also proposed eastward across Wood Lane through a proposed green area linking to the existing footpath at the A458 south of the Church. The applicant considers this to be a more desirable route to local amenities and the school for residents of the site. The school would be 930m away using this route.
- iv. It is confirmed that traffic calming measures, such as additional signing and lining would be implemented to enforce the 30mph speed limit.
- v. It is confirmed that a transport assessment for the formal planning application would include updated personal injury collision and traffic data.
- vi. It is confirmed that five trees located within the Raby Estate's ownership would be removed to achieve visibility in perpetuity. This would be compensated on elsewhere on the development site.
- vii. It is confirmed that only one vehicular access would serve the site from Shrewsbury Road with just pedestrian access proposed on Shore Lane.
- viii. It is stated that the pedestrian access would encourage sustainable and safe pedestrian movements through the village and will enhance the area's accessibility and connectivity in accordance with Draft Policy SP7 and SP28.

Assessment of Highway / Pedestrian matters:

- 3.2.11 Access: The applicant has demonstrated that an access onto the A458 is achievable with visibility splays commensurate with the 30mph limit, provided some mature trees within the land ownership of the Raby Estate are removed. The applicant proposed to compensate for the loss of these trees with planting elsewhere.
- 3.2.12 The Highway Authority has indicated that traffic calming will be required as in practice many eastbound vehicles are decelerating at speeds in excess of 30mph as they pass the proposed access point. The nature of such calming would need to be agreed with the Highway Authority and would be an important consideration for any planning application. Currently there is no indication at this stage that appropriate calming measures would not be achievable, though speed humps would not be supported for amenity reasons. Ideally, a greater westbound visibility splay should be achievable.
- 3.2.13 The proposal not to provide a secondary vehicular access on Shore Lane is supported given the minor nature of this road and issues with its access to the A458. However, the option of maintaining access for use by emergency services should be retained.

- 3.2.14 Pedestrian provision: Two options have been proposed for pedestrian access from the site to the centre of the village. The first is via an informal crossing point to the footpath on the north side of the A458. The Highway Authority has expressed concern that this route in places is less than the target width of 2m for pedestrian provision and this may raise safety concerns given that the A458 is trafficked by HGVs. This concern is exacerbated locally by hedges protruding into the footpath. to the immediate north-west of the proposed site access. There may be some limited options for localised widening within highway land. However, I would not consider this route optimal for by parents with pushchairs or mobility scooters.
- 3.2.15 The second footpath option passes eastward from the southern end of the proposed site, linking to public footpaths on the A458 south of Christ Church. This would provide a safer access for pedestrians to the school, though it would be a longer option for residents in the northern part of the site. The closest walking distance of the school from the edge of the proposed development is 920m and 1080m to the surgery. There is a need to negotiate a small valley and stream with floodplain which would require a footbridge, an all-weather surface and measures to alleviate gradients. Artificial lighting would be required for darker hours / winter months. Provision of this route may entail significant cost but would also provide access to new public open space for the benefit of existing and proposed new residents.
- 3.2.16 Highway matters, conclusion: It is considered that the submitted information supports the conclusion that an acceptable access to the A458 is likely to be achievable, subject to removal of roadside trees within the visibility splay and provision for traffic calming measures.
- 3.2.17 In terms of pedestrian provision there are some concerns about the narrowness and safety of the footpath link running to the village centre from the north of the site. The alternative route passing east from the site through the proposed public open space offers a potential safe access but is likely to require significant engineering works to make it fit for purpose. The walking distance is c450m to the church, c900m to the school and 1080m to the surgery. This may favour use of the private car for some visits.
- 3.3 Other environmental considerations
- 3.3.1 With the exception of comments by SC Planning Policy and SC Highways none of the consultation responses above raise significant issues which would potentially weigh against the proposals. The loss of some mature trees on the highway frontage to achieve a visibility splay is regrettable but the Council's trees officer has not objected, and it is confirmed that proposed planting measures would mitigate this. Existing mature trees and hedgerows within the site would be retained and protected.
- 3.3.2 The Council's landscape consultant has not objected at this stage and has acknowledged that the proposals have the potential to deliver some benefits from the proposed landscape planting and management works. There are no objections

from heritage consultees, subject to an archaeological survey condition. The council's drainage team has also not objected subject to inclusion of a flood risk assessment in any subsequent application.

- 3.3.3 The council's ecology team has not objected subject to the requirements that any application delivers at least 10% nett biodiversity gain and is accompanied by the requisite ecological and protected species surveys. Taking this together it is considered that the proposals would have the potential to comply with existing and emerging policies covering the historic and natural environment. However, they would not comply with current and spatial housing policy and emerging spatial housing policy as it is currently worded.

4. LAYOUT

- 4.1 The housing layout appears cramped within the available space. It is recognised that this is partly due to the need to retain existing established vegetation within the site. The implication is a complex street arrangement with numerous cul-de sacs and lower order closes. It is not clear whether houses would be able to accommodate at least 2 cars in front drives (the front gardens look very short) and what consideration has been given to overspill / visitor parking. There is a concern that on-street parking may restrict access for emergency services, delivery and other large vehicles.
- 4.2 There is a particular issue for refuse collection vehicles. It is unclear how such vehicles would be able to manoeuvre into the site and turn. There don't appear to be any suitably sized turning hammerheads available. If access by refuse collection vehicles is possible then residents of lower order streets would still need to wheel their refuse / recycling to a higher order street. This would be a significant distance for occupants of the mews area at the southern end of the site. Overall I have concerns that the confused nature of the street pattern could lead to a risk of gridlock and access problems, including for the emergency services. This problem could be addressed with an amended layout, but it may be necessary to reduce housing numbers to resolve this.
- 4.3 Some houses in the central part of the site have opposing principal elevations and appear to be separated by distances of less than 21m. If so, this would need to be amended in any subsequent application.
- 4.4 It is assumed that there are two employment units coloured in darker grey on the layout plan. These are integrated closely within the housing area which may give rise to amenity issues depending on the type of employment use.
- 4.5 Generally existing vegetation has been sympathetically retained and the houses have a sympathetic relationship to existing dwellings. The arrangement of some houses around a central green area is supported. The housing mix appears balanced, with a mixture of detached and semi-detached homes. However, the physical constraints of the site have complicated the design and layout of housing and highways within the site.

4.6 An amended layout will be necessary to address the above concerns. This may involve increasing the proportion of semis and reducing housing numbers overall.

5. SUPPORTING CONSIDERATIONS

5.1 The planning statement puts forward a number of reasons in support of the proposals which are listed in part 1 of this pre-application response. These are acknowledged but any commitments are insufficiently detailed at this stage to be given significant weight.

5.2 For instance, it is not clear exactly what measures would be put in place to ensure that the proposed houses met high standards of environmental sustainability. Would these meet current best practice for insulation? Would they be fitted with air source heat pumps? Would they have electric car chargers? It is recognised that the Raby Estate controls significant land in Cressage but how in practice would the proposals deliver nett biodiversity gain? Additionally, what design criteria would be adhered to in order to ensure that the proposed dwellings were of a high quality and appropriate to the local vernacular?

5.3 Access to existing public open space in Cressage is limited. It is considered that the proposed eastern area of public open space would potentially be beneficial for both existing residents and those of the proposed development. This is provided commitments to deliver suitable all-weather footpath and footbridge are given. It is not yet clear whether benches would be provided in POS areas and how these would be maintained.

5.4 The proposals have the potential to improve pedestrian linkages between the main body of housing to the west of the A458 and the footpaths and associate green space to the west of the A458. Ideally, a circular walk should be identified with consideration to additional permissive routes on Raby Estates land.

5.5 The commitment to strategic landscape management offers the potential to significantly increase the level of planting and improve management of existing vegetation in this area to the south-west of the village geographical centre. However, as noted above, the potential extent of such benefits would need to be detailed further in any planning application.

5.6 The NPPF advises that all housing delivers benefits, but this does not outweigh adopted housing policy. The number of proposed houses would align with that set out in the emerging plan if the currently allocated site did not proceed. The proposal for 465m² of employment space within the development would provide some opportunity for live-work units but this would be limited in the context of the 80 proposed residential homes, and it is not clear at this stage how these would be distributed throughout the site.

5.7 Another potential benefit which the proposals could deliver is over-provision of public open space and affordable housing relative to policy compliant levels. The applicant may wish to investigate this given the current policy context of the proposals.

6. **Conclusion**

- 6.1 The proposed site falls outside the development boundary for Cressage in the emerging Shropshire Local Plan and as such has the planning status of 'countryside', where open market residential development shall be resisted in accordance with national housing policy. However, the Council's Planning Policy Team has acknowledged that the proposed draft housing strategy for Cressage has been challenged so cannot yet be given significant weight.
- 6.2 The responsibility for assessing whether it is appropriate to amend this policy rests with the Inspector and it is not appropriate to make a comparative assessment with the site which is allocated in the emerging plan. However, the current proposals appear deliverable and have the potential to offer some material benefits, including to the wider village.
- 6.3 I trust that this is helpful. Please note however that this is an informal opinion based on the information you have provided at this stage. Any planning application submitted will be determined taking into account the details contained in the application; the policy of the Development Plan, Government planning policy, the outcome of any consultation with statutory or other consultees, any representations received and any other material consideration.

Yours sincerely



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APPENDIX 1 – RELEVANT CURRENT AND EMERGING POLICIES

1. Shropshire Core Strategy

CS4 Community Hubs and Community Clusters

In the rural area, communities will become more sustainable by: Focusing private and public investment in the rural area into Community Hubs and Community Clusters, and not allowing development outside these settlements unless it meets policy CS5; Allowing development within Community Hubs and Community Clusters that helps rebalance rural communities by providing facilities, economic development or housing for local needs, and is of a scale that is appropriate to the settlement; Ensuring that market housing development makes sufficient contribution to improving local sustainability through a suitable mix of housing that caters for local needs and by delivering community benefits in the form of contributions to affordable housing for local people and contributions to identified requirements for facilities, services and infrastructure. The priorities for community benefit will be identified in partnership with the community; Ensuring that all development within Community Hubs and Community Clusters is of a scale and design that is sympathetic to the character of the settlement and its environs, and satisfies policy CS6. Community Hubs and Community Clusters are identified in the Site Allocations and Management of Development DPD.

CS5 Countryside and Green Belt

In the open countryside, new development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt from inappropriate development. Subject to the further controls over development that apply to the Green Belt, development proposals on appropriate sites which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability of rural communities by bringing local economic and community benefits, particularly where they relate to:

- Small-scale new economic development diversifying the rural economy, including farm diversification schemes;
- dwellings to house agricultural, forestry or other essential countryside workers and other affordable housing or accommodation to meet a local need in accordance with national planning policies and Policies CS11 and CS12;

With regard to the above two types of development, applicants will be required to demonstrate the need and benefit for the development proposed. Development will be expected to take place primarily in recognisable named settlements or be linked to other existing development and business activity.

- agricultural/horticultural/forestry/mineral related development, although proposals for large scale new development will be required to demonstrate that there are no unacceptable adverse environmental impacts;
- the retention and appropriate expansion of an existing established business, unless relocation to a suitable site within a settlement would be more appropriate;
- the conversion or replacement of suitably located buildings for small scale economic development / employment generating use;
- sustainable rural tourism and countryside recreation proposals in accordance with Policies CS16 and CS17;

- required community uses and infrastructure which cannot be accommodated within settlements;
- conversion of rural buildings which take account of and make a positive contribution to the character of the buildings and the countryside.

Proposals for conversions will be considered with regard to the principles of PPS7, giving equal priority to the following uses:

- small scale economic development/employment generating use, including live-work proposals and tourism uses;
- affordable housing to meet local need (including agricultural workers dwellings);
- other uses appropriate to a countryside location.

Open market residential conversions will only be considered where high standards of sustainability are achieved and, except where the buildings are listed, a financial contribution for the provision of affordable housing to be delivered off site is provided in accordance with Policy CS11. In all cases, development proposals should be consistent with the requirements of Policies CS6 and CS17.

Policy CS6 (Sustainable Design and Development Principles) seeks 'to create sustainable places, development will be designed to a high quality using sustainable design principles, to achieve an inclusive and accessible environment which respects and enhances local distinctiveness and which mitigates and adapts to climate change'. Development must protect, restore, conserve and enhance the natural, built and historic environment and be appropriate in scale, density, pattern and design taking into account the local context and character. It should contribute to the health and wellbeing of communities, including safeguarding residential and local amenity. It should make the most effective use of land and safeguard natural resources including high quality agricultural land, geology, minerals, air, soil and

CS7: Communications and Transport

A sustainable pattern of development requires the maintenance and improvement of integrated, accessible, attractive, safe and reliable communication and transport infrastructure and services. These need to provide a range of opportunities for communication and transport which meet social, economic and environmental objectives by improving accessibility, managing the need to travel, offering options for different travel needs and reducing the impacts of transport. This will be achieved by: promoting greater awareness of travel behaviour to encourage more informed choices about communication, the need to travel and alternative travel options; promoting the use of information and communication technologies (ICT) to reduce the impacts of individual travel decisions at work, at home and for leisure; facilitating enterprise and improved access to services and information using ICT/broadband technologies especially by managing the development of fixed and mobile ICT infrastructure and enabling local access to ICT facilities; protecting and enhancing strategic and local cycling, footpath, bridleway and canal networks as local transport routes and for recreation and leisure use; enabling the provision of accessible, affordable and demand responsive passenger transport services including bus, Park & Ride, rail, coach, taxi, community transport services and car sharing initiatives; promoting rail related developments to support the sub-regional role of Shrewsbury and the role of Market Towns and other rail linked centres and increasing choice of destinations and service frequency and travel times. This will require rail infrastructure and service improvements especially

along the A5/M54 rail corridor including a Parkway Station for Shrewsbury; promoting and enabling improvements to the strategic and local highway network including improvements to the A5 Shrewsbury and Oswestry bypasses and promotion of the Shrewsbury North West Relief Road; facilitating freight movements through the County road and rail networks especially along the A5 and the A49 and to encourage greater freight movements by rail.

CS8: Facilities, services and infrastructure provision

The development of sustainable places in Shropshire with safe and healthy communities where residents enjoy a high quality of life will be assisted by: Protecting and enhancing existing facilities, services and amenities that contribute to the quality of life of residents and visitors; Preserving and improving access to facilities and services wherever possible, including access to information and communication technologies (ICT), throughout Shropshire; Facilitating the timely provision of additional facilities, services and infrastructure to meet identified needs, whether arising from new developments or existing community need, in locations that are appropriate and accessible; Positively encouraging infrastructure, where this has no significant impact on recognised environmental assets, that mitigates and adapts to climate change, including decentralised, low carbon and renewable energy generation, and working closely with network providers to ensure provision of necessary energy distribution networks.

CS9: infrastructure contributions

Development that provides additional dwellings or employment premises will help deliver more sustainable communities by making contributions to local infrastructure in proportion to its scale and the sustainability of its location, in the following order of priority: 1. Critical infrastructure that is necessary to ensure adequate provision of essential utilities, water management and safe access for the development 2. Priority infrastructure, as identified in the LDF Implementation Plan, including contributions from residential developments towards affordable housing as required to meet Policy CS11 Type and Affordability of Housing 3. Key infrastructure as identified in the LDF Implementation Plan.

CS11: Type and affordability of housing

To meet the diverse housing needs of Shropshire residents now and in the future and to create mixed, balanced and inclusive communities, an integrated and balanced approach will be taken with regard to existing and new housing, including type, size, tenure and affordability. This will be achieved by: Seeking housing developments which help to balance the size, type and tenure of the local housing stock. Seeking to achieve an overall target of 33% local needs affordable housing from all sources for the first five years of the plan period, comprised of 20% social-rented and 13% intermediate affordable housing. Subsequent targets will be set through the Housing Strategy for Shropshire. Individual schemes will encompass a mix of tenures including social-rented and intermediate housing, determined by the Council using the most recent information on housing needs at the local level. Ensuring that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard. Supporting the provision of housing for vulnerable people and specialist housing

provision, including nursing homes, residential and extra care facilities, in appropriate locations and where there is an identified need. Ensuring that all new open market housing development makes appropriate contributions to the provision of local needs affordable housing having regard to the current prevailing target rate, set using the Shropshire Viability Index. For all sites of 5 dwellings and above, the provision of affordable housing will be expected to be on site. Requiring residential conversion schemes in the countryside, where permitted under Policy CS5, except listed buildings, to contribute to the provision of local needs affordable housing. This will be on the basis of an additional 15% above the contribution set for new open market housing, of the cost of construction of equivalent affordable dwelling floorspace. Permitting exception schemes for local needs affordable housing on suitable sites in and adjoining Shrewsbury, Market Towns and Other Key Centres, Community Hubs, Community Clusters and recognisable named settlements, subject to suitable scale, design, tenure and prioritisation for local people and arrangements to ensure.

CS13: Economic Development, Enterprise and Employment

Shropshire Council, working with its partners, will plan positively to develop and diversify the Shropshire economy, supporting enterprise, and seeking to deliver sustainable economic growth and prosperous communities. In doing so, particular emphasis will be placed on: Promoting Shropshire as a business investment location and a place for a range of business types to start up, invest and grow, recognising the economic benefits of Shropshire's environment and quality of life as unique selling points which need to be valued, conserved and enhanced Raising the profile of Shrewsbury, developing its role as the county town, growth point and the main business, service and visitor centre for the Shropshire sub-region, in accordance with Policy CS2 Supporting the revitalisation of Shropshire's market towns, developing their role as key service centres, providing employment and a range of facilities and services accessible to their rural hinterlands, in accordance with Policy CS3 Supporting the development and growth of Shropshire's key business sectors and clusters, in particular: environmental technologies; creative and cultural industries; tourism; and the land based sector, particularly food and drink production and processing Planning and managing a responsive and flexible supply of employment land and premises comprising a range and choice of sites in appropriate locations to meet the needs of business, with investment in infrastructure to aid their development or to help revitalise them Supporting initiatives and development related to the provision of higher/further education facilities which offer improved education and training opportunities to help raise skills levels of residents and meet the needs of employers Supporting the development of sustainable transport and ICT/broadband infrastructure, to improve accessibility/connectivity to employment, education and training opportunities, key facilities and services Encouraging home based enterprise, the development of business hubs, live-work schemes and appropriate use of residential properties for home working. In rural areas, recognising the continued importance of farming for food production and supporting rural enterprise and diversification of the economy, in particular areas of economic activity associated with agricultural and farm diversification, forestry, green tourism and leisure, food and drink processing, and promotion of local food and supply chains. Development proposals must accord with Policy CS5.

CS14: Managed release of Employment Land

A strategic supply of employment land and premises will be identified and managed to deliver around 290 hectares of employment development from 2006 to 2026 which will be distributed in accordance with the strategic approach in Policy CS1. This strategic supply of employment land and premises will satisfy the employment needs of the different locations in the settlement strategy in accordance with Policies CS2, CS3, CS4, and CS5. A suitable portfolio of employment land and premises will be identified and maintained to provide a range and choice of sites in terms of their quality, accessibility, type and size which will comprise: sites above 0.1ha as the threshold for the strategic land supply; developable land currently committed for employment use; employment land and premises allocated to meet the longer term employment land requirement including sites of sub-regional significance; dedicating land and premises for the use of key local employers; appropriate allowances for local economic development opportunities. The portfolio of employment land and premises will be supported by: protecting existing strategic employment land and premises to secure these sites for employment uses; safeguarding sufficient land to facilitate the delivery of: other strategic development objectives including town centre uses in Policies CS2 and CS15 and waste infrastructure in Policy CS19 subject to relevant policy tests including the protection of town centre vitality and viability; other land uses which contribute to the creation and maintenance of sustainable communities in Policies CS6 and CS8; ancillary facilities, services or uses which support enterprise and economic growth especially in employment developments. The portfolio of employment land and premises will be identified and managed in accordance with national guidance to principally satisfy the employment requirements in the RSS; The portfolio of employment land will be delivered using a managed Reservoir which will comprise: a rolling 5 year strategic land supply of 72 hectares comprising readily available employment commitments and allocations; the initial Reservoir will largely comprise the developable supply of committed land and premises; the Reservoir will be reviewed annually through the Annual Monitoring Report to support economic development but: the Reservoir will also allow other land and premises to come forward to support the Core Strategy objectives.

CS17: Environmental Networks

Development will identify, protect, enhance, expand and connect Shropshire's environmental assets, to create a multifunctional network of natural and historic resources. This will be achieved by ensuring that all development: Protects and enhances the diversity, high quality and local character of Shropshire's natural, built and historic environment, and does not adversely affect the visual, ecological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors. Further guidance will be provided in SPDs concerning the natural and built environment; Contributes to local distinctiveness, having regard to the quality of Shropshire's environment, including landscape, biodiversity and heritage assets, such as the Shropshire Hills AONB, the Meres and Mosses and the World Heritage Sites at Pontcysyllte Aqueduct and Canal and Ironbridge Gorge Does not have a significant adverse impact on Shropshire's environmental assets and does not create barriers or sever links between dependant sites; Secures financial contributions, in accordance with

Policy CS8, towards the creation of new, and improvement to existing, environmental sites and corridors, the removal of barriers between sites, and provision for long term management and maintenance. Sites and corridors are identified in the LDF evidence base and will be regularly monitored and updated.

CS18: Sustainable Water Management

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, 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 should 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 sustainable drainage systems (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 waste 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 protect water resources and reduce pressure on wastewater treatment infrastructure; Further guidance on designing safe developments, surface water management and water efficiency will be provided in a Water Management SPD.

1.4 Site Management and Allocation of Development Plan ('SAMDev')

Further to Policy CS6, for a development proposal to be considered acceptable it is required to:

1. Respond positively to local design aspirations wherever possible, both in terms of visual appearance and how a place functions, as set out in Community Led Plans, Town or Village Design Statements, Neighbourhood Plans and Place Plans.
2. Contribute to and respect locally distinctive or valued character and existing amenity value by:

- i. Responding appropriately to the form and layout of existing development and the way it functions, including mixture of uses, streetscape, building heights and lines, scale, density, plot sizes and local patterns of movement; and
 - ii. Reflecting locally characteristic architectural design and details, such as building materials, form, colour and texture of detailing, taking account of their scale and proportion; and
 - iii. Protecting, conserving and enhancing the historic context and character of heritage assets, their significance and setting, in accordance with MD13; and
 - iv. Enhancing, incorporating or recreating natural assets in accordance with MD12.
3. Embrace opportunities for contemporary design solutions, which take reference from and reinforce distinctive local characteristics to create a positive sense of place, but avoid reproducing these characteristics in an incoherent and detrimental style;
4. Incorporate Sustainable Drainage techniques, in accordance with Policy CS18, as an integral part of design and apply the requirements of the SuDS handbook as set out in the Local Flood Risk Management Strategy.
5. Consider design of landscaping and open space holistically as part of the whole development to provide safe, useable and well-connected outdoor spaces which respond to and reinforce the character and context within which it is set, in accordance with Policy CS17 and MD12 and MD13, including;
 - i. Natural and semi-natural features, such as, trees, hedges, woodlands, ponds, wetlands, and watercourses, as well as existing landscape character, geological and heritage assets and;
 - ii. providing adequate open space of at least 30sqm per person that meets local needs in terms of function and quality and contributes to wider policy objectives such as surface water drainage and the provision and enhancement of semi natural landscape features. For developments of 20 dwellings or more, this should comprise an area of functional recreational space for play recreation, formal or informal uses and recreation uses including semi-natural open space. Where an adverse effect on the integrity of an internationally designated wildlife site due to recreational impacts has been identified, particular consideration will be given to the need for semi-natural open space, using 30sqm per person as a starting point;
 - iii. ensuring that ongoing needs for access to manage open space have been provided and arrangements are in place for it to be adequately maintained in perpetuity.
6. Ensure development demonstrates there is sufficient existing infrastructure capacity, in accordance with MD8, and should wherever possible actively

seek opportunities to help alleviate infrastructure constraints, as identified with the Place Plans, through appropriate design;

7. Demonstrate how good standards of sustainable design and construction have been employed as required by Core Strategy Policy CS6 and the Sustainable Design SPD.

MD3 – Delivery of Housing Development

Delivering housing:

In addition to supporting the development of the allocated housing sites set out in Settlement Policies S1-S18, planning permission will also be granted for other sustainable housing development having regard to the policies of the Local Plan, particularly Policies CS2, CS3, CS4, CS5, MD1 and MD7a.

1. Residential proposals should:
 - i. meets the design requirements of relevant Local Plan policies; and
 - ii. on sites of five or more dwellings, includes a mix and type of housing that has regard to local evidence and community consultation.

Settlement housing guideline:

2. The settlement housing guideline is a significant policy consideration. Where development would result in the number of completions plus outstanding permissions providing more dwellings than the guideline, decisions will have regard to:
 - i. The increase in number of dwellings relative to the guideline; and
 - ii. The likelihood of delivery of the outstanding permissions; and
 - iii. Evidence of community support; and
 - iv. The benefits arising from the development; and
 - v. The presumption in favour of sustainable development.
3. Where a settlement housing guideline appears unlikely to be met by the end of the plan period, additional sites beyond the development boundary that accord with the settlement policy may be acceptable subject to the criteria in paragraph 3 above.

MD4 - Managing Employment Development

Further to Policies CS14 and CS19, as part of the management of a portfolio of employment land and premises and to maintain a reservoir of available sites:

1. Employment land and development will be delivered by permitting proposals that are sustainable development and:
 - i. are on committed or allocated sites (portfolio sites) identified in Policies S1 – S18 and on the Proposals Map; or
 - ii. are other suitable, small scale development sites; and
 - iii. comprise Class B or sui generis uses which include industrial or commercial employment opportunities;
 - iv. are operations which are compatible with adjoining uses;
 - v. satisfy the relevant settlement policy and accompanying development guidelines;

2. Proposals for alternative uses on portfolio sites which do not satisfy iii. above will only be acceptable where the applicant can also demonstrate that:
 - i. there are no other suitable development sites for the proposal;
 - ii. the development will provide significant employment opportunities or other significant benefits for the sustainability of the community;
 - iii. the development will not adversely affect the range and choice of employment sites in terms of location, quality, type and size.

MD7a – Managing Housing Development in the Countryside

1. Further to Core Strategy Policy CS5 and CS11, new market housing will be strictly controlled outside of Shrewsbury, the Market Towns, Key Centres and Community Hubs and Community Clusters. Suitably designed and located exception site dwellings and residential conversions will be positively considered where they meet evidenced local housing needs, other relevant policy requirements and , in the case of market residential conversions, a scheme provides an appropriate mechanism for the re-use and retention of buildings which are heritage assets. In order to protect the long term affordability of affordable exception dwellings, they will be subject to size restrictions and the removal of permitted development rights, as well as other appropriate conditions or legal restrictions;
2. Dwellings to house essential rural workers will be permitted if:-
 - a. there are no other existing suitable and available affordable dwellings or other buildings which could meet the need, including any recently sold or otherwise removed from the ownership of the rural enterprise; and,
 - b. in the case of a primary dwelling to serve an enterprise without existing permanent residential accommodation, relevant financial and functional tests are met and it is demonstrated that the business is viable in the long term and that the cost of the dwelling can be funded by the business. If a new dwelling is permitted and subsequently no longer required as an essential rural workers' dwelling, a financial contribution to the provision of affordable housing will be required, calculated in accordance with the current prevailing target rate and related to the floorspace of the dwelling; or,
 - c. in the case of an additional dwelling to provide further accommodation for a worker who is required to be present at the business for the majority of the time, a functional need is demonstrated and the dwelling is treated as affordable housing, including size restrictions. If a new dwelling is permitted and subsequently no longer required as an essential rural workers' dwelling, it will be made available as an affordable dwelling, unless it can be demonstrated that it would not be suitable. Where unsuitability is demonstrated, a financial contribution to the provision of affordable housing, equivalent to 50% of the difference in the value between the affordable and market dwelling will be required. Such dwellings will be subject to occupancy conditions. Any existing dwellings associated with the rural enterprise may also be subject to occupancy restrictions, where appropriate. For primary and additional rural workers' dwellings permitted prior to the adoption of the Core Strategy in March

2011, where occupancy restrictions are agreed to be removed, an affordable housing contribution will be required in accordance with Policy CS11 at the current prevailing target rate and related to the floorspace of the dwelling.

4. In addition to the general criteria above, replacement dwelling houses will only be permitted where the dwelling to be replaced is a permanent structure with an established continuing residential use. Replacement dwellings should not be materially larger and must occupy the same footprint unless it can be demonstrated why this should not be the case. Where the original dwelling had been previously extended or a larger replacement is approved, permitted development rights will normally be removed;
5. The use of existing holiday let properties as permanently occupied residential dwellings will only be supported if:
 - a. the buildings are of permanent construction and have acceptable residential amenity standards for full time occupation; and,
 - b. the dwellings are restricted as affordable housing for local people; or,
 - c. the use will preserve heritage assets that meet the criteria in Policy CS5 in relation to conversions and an affordable housing contribution is made in line with the requirements set out in Core Strategy Policy CS11.

MD12: The Natural Environment

In accordance with Policies CS6, CS17 and through applying the guidance in the Natural Environment SPD, the conservation, enhancement and restoration of Shropshire's natural assets will be achieved by:

1. Ensuring that the social or economic benefits of development can be demonstrated to clearly outweigh the harm to natural assets where proposals are likely to have an unavoidable significant adverse effect, directly, indirectly or cumulatively, on any of the following:
 - i. the special qualities of the Shropshire Hills AONB;
 - ii. locally designated biodiversity and geological sites;
 - iii. priority species;
 - iv. priority habitats
 - v. important woodlands, trees and hedges;
 - vi. ecological networks
 - vii. geological assets;
 - viii. visual amenity;
 - ix. landscape character and local distinctiveness.In these circumstances a hierarchy of mitigation then compensation measures will be sought.
2. Encouraging development which appropriately conserves, enhances, connects, restores or recreates natural assets, particularly where this improves the extent or value of those assets which are recognised as being indoor condition.
3. Supporting proposals which contribute positively to the special characteristics and local distinctiveness of an area, particularly in the Shropshire Hills AONB, Nature Improvement Areas, Priority Areas for Action or areas and

sites where development affects biodiversity or geodiversity interests at a landscape scale, including across administrative boundaries.

MD13: The Historic Environment

In accordance with Policies CS6 and CS17 and through applying the guidance in the Historic Environment SPD, Shropshire's heritage assets will be conserved, sympathetically enhanced and restored by:

1. Ensuring that proposals which are likely to either directly or indirectly affect the significance of a heritage asset, including its setting, are accompanied by a Heritage Assessment.
2. Ensuring that the social or economic benefits of a development can be demonstrated to clearly outweigh any adverse effects on the significance of a heritage asset, or its setting, taking into account the degree of harm, the importance of the asset and any potential beneficial use of the asset. Where such proposals are permitted, measures to offset and record the loss of significance to the heritage asset and to advance understanding in a manner proportionate to the asset's importance and the level of impact, will be required.
3. Encouraging development which delivers positive benefits to heritage assets, as identified within the Place Plans. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition.

1.5 Emerging Local Plan

SP3. Climate Change

SP4. Sustainable Development

SP5. High-Quality Design

SP6. Health and Wellbeing

SP7. Managing Housing Development

SP8. Managing Development in Community Hubs

SP10. Managing Development in the Countryside

SP13. Delivering Sustainable Economic Growth and Enterprise

DP1. Residential Mix

DP3. Affordable Housing Provision

DP11. Minimising Carbon Emissions

DP12. The Natural Environment

DP14. Green Infrastructure

DP15. Open Space and Recreation

DP16. Landscaping of New Development

DP17. Landscape and Visual Amenity

DP18. Pollution and Public Amenity

DP19. Water Resources and Water Quality

DP21. Flood Risk

DP22. Sustainable Drainage Systems

DP23. Conserving and Enhancing the Historic Environment

DP25. Infrastructure Provision

DP26. Strategic, Renewable and Low Carbon Infrastructure
DP27. Broadband and Mobile Communications Infrastructure
DP28. Communications and Transport
S13. Much Wenlock Place Plan Area
S13.4. Wider Rural Area: Much Wenlock Place Plan Area

APPENDIX 3

LOCAL LIST VALIDATION REQUIREMENTS

Providing that the information detailed in the above section is provided within the following list of documents, it will enable the application to be registered and validated against the Council's local list validation requirements:-

- Planning Statement
- Statement of Community Involvement
- Environmental Assessment (not a formal ES under the EIA regulations but a statement of the impact of the development)
- Visual Impact Assessment
- Photographs and Photo Montages
- Traffic Management Plan
- Ecological Assessment
- Bat Survey
- Great Crested Newt Assessment
- Statement of Enhancements to Environmental Network
- Flood Risk Assessment
- Surface Water Management Statement

National List Validation Requirements

I can also confirm the application will need to comply with National submission requirements in order to be validated and for this particular proposal I recommend that you also submit the following

✓ Completed Application Form

Where possible please submit using the online [Planning Portal](#) however if you wish to download and submit a paper application, please submit a total of 2 sets of all documents. Please also ensure that the **Ownership Certificate (A,B, C or D as applicable)** and the **Agricultural Land Declaration** sections are completed in all instances

✓ **Location Plan**

Based on an up-to-date map at an identifiable metric scale (1:1250 or 1:2500). The plan should identify sufficient roads, buildings, adjoining land etc. to ensure that location of the site is clear. The site should be edged clearly in red line and include all that is within the proposal; including any access from a highway, landscaping, parking, open areas around building etc. A blue line should be drawn around any other land owned or controlled by the applicant if close to or adjoining the site.

✓ **Site Plan (existing and proposed)**

Applications should normally include existing and proposed plans at a standard metric scale (1:100 or 1:200 for householder applications and 1:500 otherwise). All site plans should be numbered and versioned if the drawing is subsequently amended. All site plans should accurately show:-

- Direction of North and an indication of scale
- The footprint of all existing buildings on site with written dimensions and distances to the site boundaries or a scale bar appropriate to the building scale. If using more than one scale on a drawing please clearly indicate so.
- The paper size that the drawing should be printed at
- Building, roads and footpaths on adjoining land to the site including access
- Any public Rights of Way
- The position of all existing trees on and adjacent to the site
- The extent and type of hard surfacing
- Boundary treatment including type and height of walls or fencing

Types of existing and proposed site plans include:-

- Block plan of site (e.g. at 1:100 or 1:200) showing site boundaries
- Existing and proposed elevations (e.g. at 1:50 or 1:100)
- Existing and proposed floor plans (e.g. at 1:50 or 1:100)
- Existing and proposed site sections and finished floor and site levels (e.g. at 1:50 or 1:100)
- Roof plans (e.g. at 1:50 or 1:100)

As all application are stored electronically and made available via the Shropshire Council website, applicants are asked to ensure that documents and drawings are of a sufficient quality and that their clarity is such that the documents can be viewed accurately after being scanned.

✓ **The correct planning fee**

Most applications incur a fee. The on-line Planning Portal includes a fee calculator for applicants, however you can also contact Shropshire Council Planning Validation Team for clarification on the correct fee to submit:-

Email: planningcvt@shropshire.gov.uk

Phone: 0345 678 9004

✓ **Design and Access Statement**

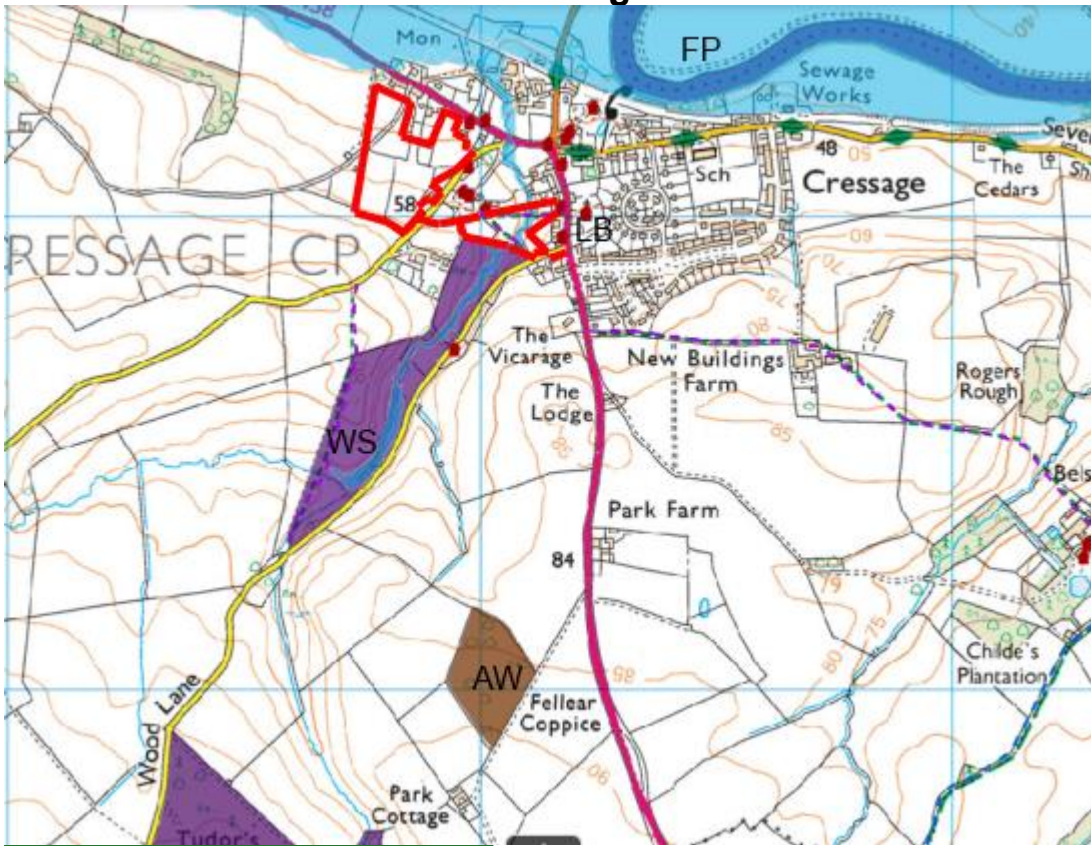
A written report supporting the proposed development and should include a written description and justification of the proposal, show that the proposal is based on a thoughtful design process and a sustainable approach to access. The level of detail

required depends on the scale and complexity of the application, and the length of the statement varies accordingly.

For further information regarding validation requirements for Planning applications, please visit the Shropshire Council website, [Planning pages](#).

When submitting your follow on application, please ensure that you clearly state the Pre-Application 'Planning Reference' number that is provided at the top of this letter.

APPENDIX 3 - Environmental Designations

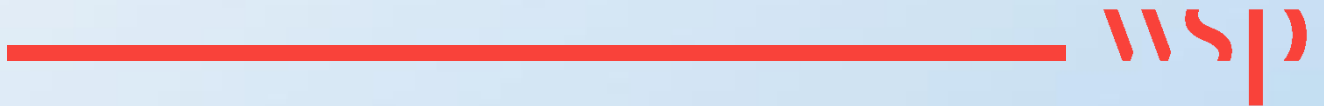


Layer List

- Rights of way ...
- Footpath
- Permissive Footpath
- Bridleway
- Permissive Bridleway
- Restricted Byway
- BOAT
- Street gazetteer ...
- Roads (classified) ...
- Roads - speed limits ...
- AONB ...
- Greenbelt ...
- Floodzone 2 ...
- Floodzone 3 ...
- SSSI ...
- SWT Wildlife Sites ...
- Conservation Areas ...
- Listed Buildings ...
- World Heritage Sites ...
- Ancient Woodlands ...
- RAMSAR ...
- Special areas of conservation ...
- NNR ...
- RIGS ...
- Clun Watershed area ...
- Scheduled Monuments ...
- EH Register of Historic Parks and Gardens ...

Appendix E

PEDESTRIAN ACCESSIBILITY REVIEW



Land at Shore Lane, Cressage

Pedestrian Accessibility Review

Client: Raby Estates

Date: 06 June 2024

Prepared by: LCW

Job No: 324468

Approved by: ME

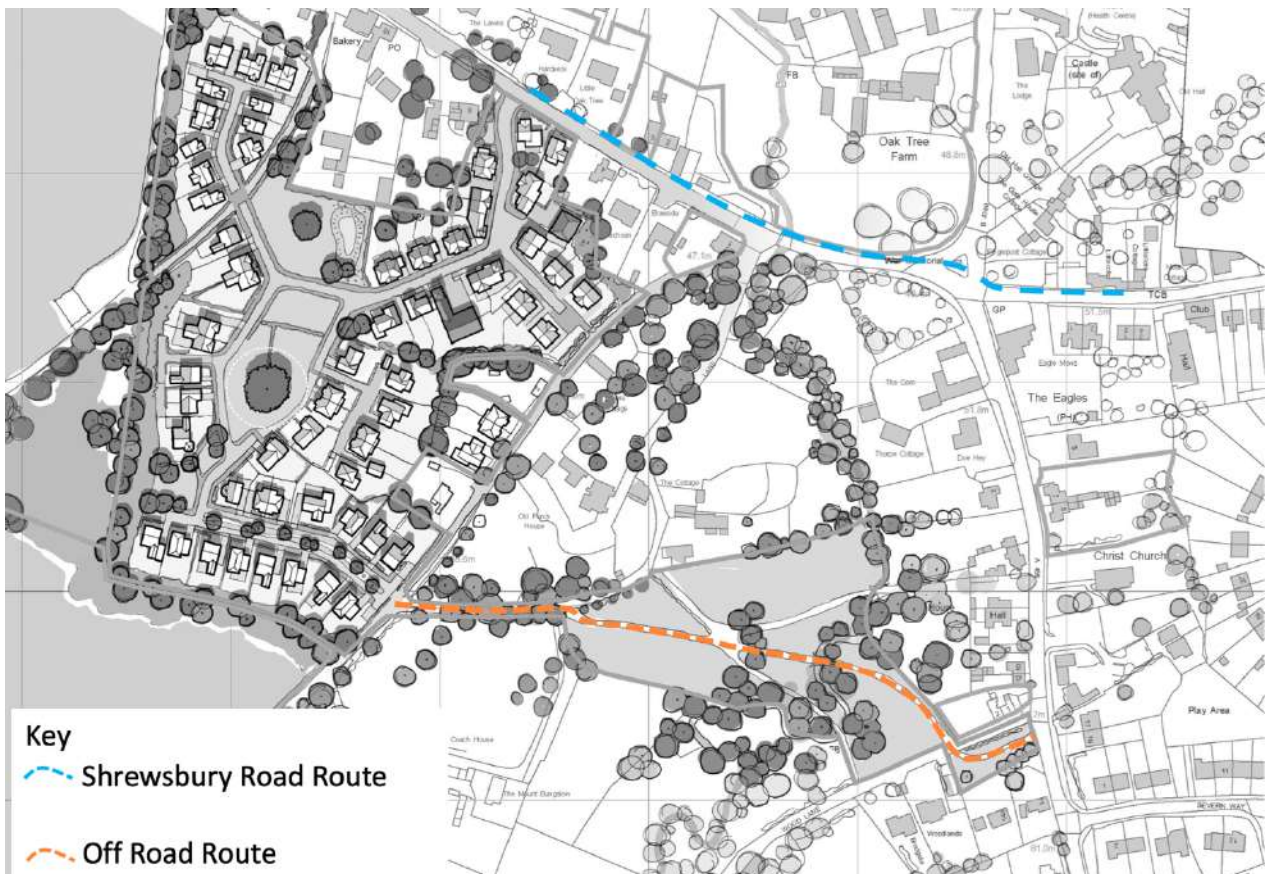
1. Introduction

1.1.1 Mode Transport Planning ('Mode') have been appointed by Raby Estates to provide transport planning and highway advice in relation to a parcel of land, west of Shore Lane, Cressage.

1.1.2 This Technical Note has been prepared to provide a detailed review of pedestrian accessibility for the proposed development site, focusing on two proposed pedestrian routes via Shrewsbury Road to the north and via Raby Estate owned land to the east (hereafter named the 'off-road route').

1.1.3 The proposed pedestrian routes are shown in [Figure 1.1](#).

Figure 1.1 : Proposed Pedestrian Routes

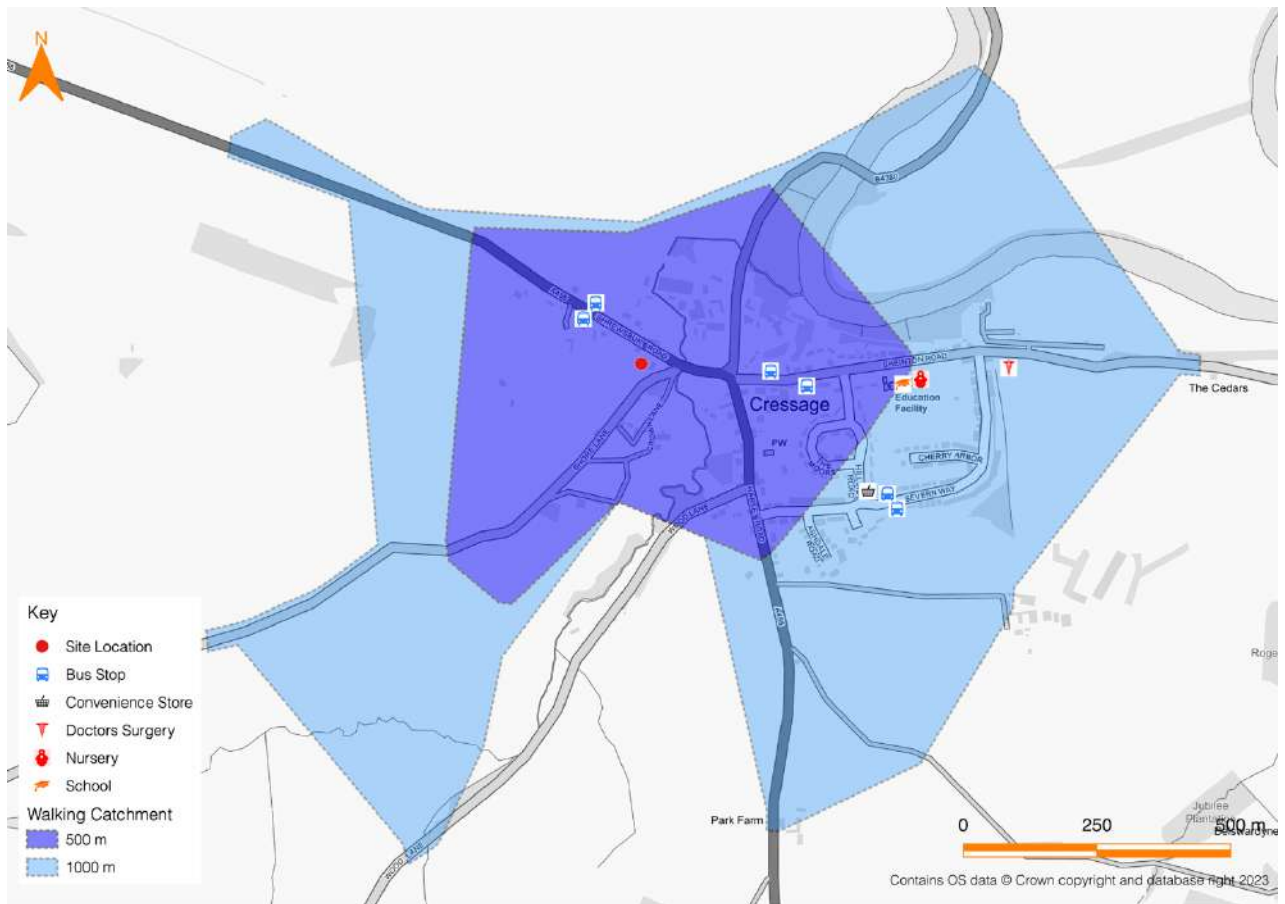


2. Local Amenities

2.1.1 Due to its village setting, there are a few amenities within Cressage, however safe pedestrian access will be required to those that are available to reduce the reliance on private car trips.

2.1.2 [Figure 2.1](#) shows the local amenities and approximate walking distances from the site.

Figure 2.1 : Local Amenities - Cressage



2.1.3 [Table 2.1](#) shows a comparison of walking distances via both of the proposed routes to local amenities. Walking distances to bus stops on Shrewsbury Road have been excluded from the table as these are located close to the proposed site access.

2.1.4 It should be noted that walking distances are measured from the centre of the proposed site. Walking distances for the off-road route have been measured via Severn Way to avoid the narrow footway adjacent to the former Eagles Pub.

Table 2.1 : Walking Distances to Amenities

Local Amenity	Distance via Shrewsbury Road	Distance via Off-Road Route
Village Hall	420m	1km
Christ Church C of E Primary School	680m	1km
Childrensworld Nursery	680m	1km
Cressage Village Shop	830m	720m
Cressage Medical Centre	930m	1.2km

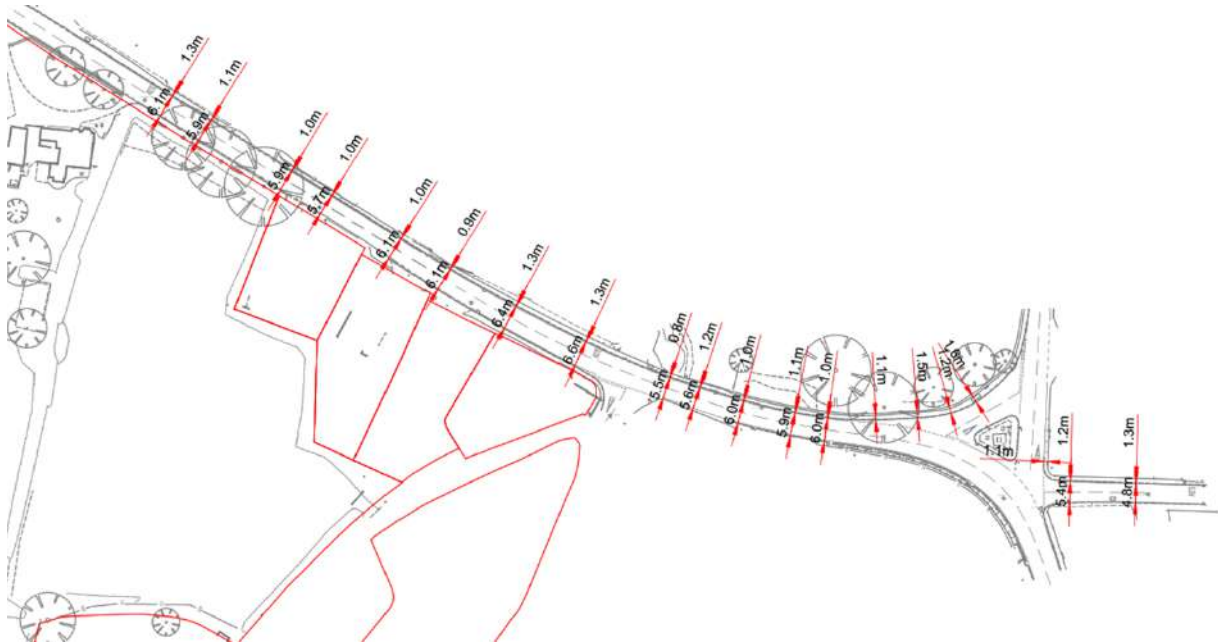
2.1.5 Analysis of the two proposed routes confirms that, in most cases, the Shrewsbury Road route is a shorter route for pedestrians than the off-road route.

3. Shrewsbury Road Route

3.1.1 A topographical survey has been undertaken along the Shrewsbury Road route in order to accurately assess the existing footway and carriageway widths. It should be noted that this is already an established route used by existing residents and visitors to Cressage.

3.1.2 Measurements along the proposed route are shown in [Figure 3.1](#) and in [Drawing J32-4468-PS-006](#) attached in [Appendix A](#).

Figure 3.1 : Shrewsbury Road Measurements



- 3.1.3 Measurements from the topographical survey demonstrate that the northern footway is consistently below the absolute minimum width of 1.5m.
- 3.1.4 The carriageway width for Shrewsbury Road would typically be expected to be a minimum of 6.75m wide due to the proportion of heavy vehicles and its use as a bus route, however, in some cases Shrewsbury County Council guidance would allow widths down to 6.1m.
- 3.1.5 Whilst the carriageway width varies from 5.5m wide to 6.6m wide, for the majority of its length, there is no scope to widen the footway into the carriageway.
- 3.1.6 As confirmed previously, there is scope to improve footway widths in the vicinity of the B4380 junction, by moving the existing retaining wall further into Raby Estate land, although the length of potential improvements is limited to c.75m, with c.150m of footway to the east remaining below the absolute minimum.
- 3.1.7 Pedestrian access beyond Shrewsbury Road is also required via Sheinton Road which has footway widths as low as 1.3m and carriageway widths as low as 4.8m. There is therefore no scope to improve the footway in this location.
- 3.1.8 In summary, based on the measurements undertaken from the topographical survey, there is no prospect of providing a pedestrian route to the local amenities via Shrewsbury Road which provides a continuous width at of greater than the 1.5m absolute minimum width set out in current highway guidance.

- 3.1.9 Notwithstanding this, the Shrewsbury Road access will serve as the primary pedestrian connection to the closest bus stops and therefore a suitable pedestrian connection will be required in this location to promote the use of sustainable transport.
- 3.1.10 A suitable pedestrian crossing will be required to access the eastbound bus stop. As a minimum a dropped kerb and tactile paving will be required, however, a signal crossing may be more appropriate subject to further discussion with the Local Highway Authority.
- 3.1.11 Footway widening along the site frontage will provide improvement for all pedestrians in the vicinity of the site and ensure visibility splays remain clear.

4. Off-road Route

- 4.1.1 The proposed off-road route exits the site on to Shore Lane before continuing onto Crown Lane, crossing open fields and reconnecting with Wood Lane.
- 4.1.2 An ATC survey was undertaken on Shore Lane to understand vehicle speeds and volumes. A summary of the results are presented in [Table 4.1](#).

Table 4.1 : Shore Lane ATC Results

Direction	85 th Percentile Speed	AADT	Percentage HGVs
Northbound	29.1mph	113	c.1%
Southbound	28.9mph	105	c.1%

- 4.1.3 The results of the ATC survey show that vehicle flows are low along Shore Lane and will result in minimal conflicting movements with pedestrians.
- 4.1.4 Vehicle speeds are well below the speed limit for the road, reducing the length of visibility splays required for the pedestrian crossing point.
- 4.1.5 The Shore Lane crossing will require a section of guard railing opposite the exit to the site to ensure that pedestrians avoid walking out into the carriageway. Visibility splays of 40.7m to the north and 41.1m to the south will be required, resulting in the loss of some hedgerow.
- 4.1.6 An ATC survey was also undertaken on Crown Lane to understand vehicle speeds and volumes. A summary of the results are presented in [Table 4.2](#).

Table 4.2 : Crown Lane ATC Results

Direction	85 th Percentile Speed	AADT	Percentage HGVs
Eastbound	9.7mph (average speed)	2	0%
Westbound	14.6mph	2	0%

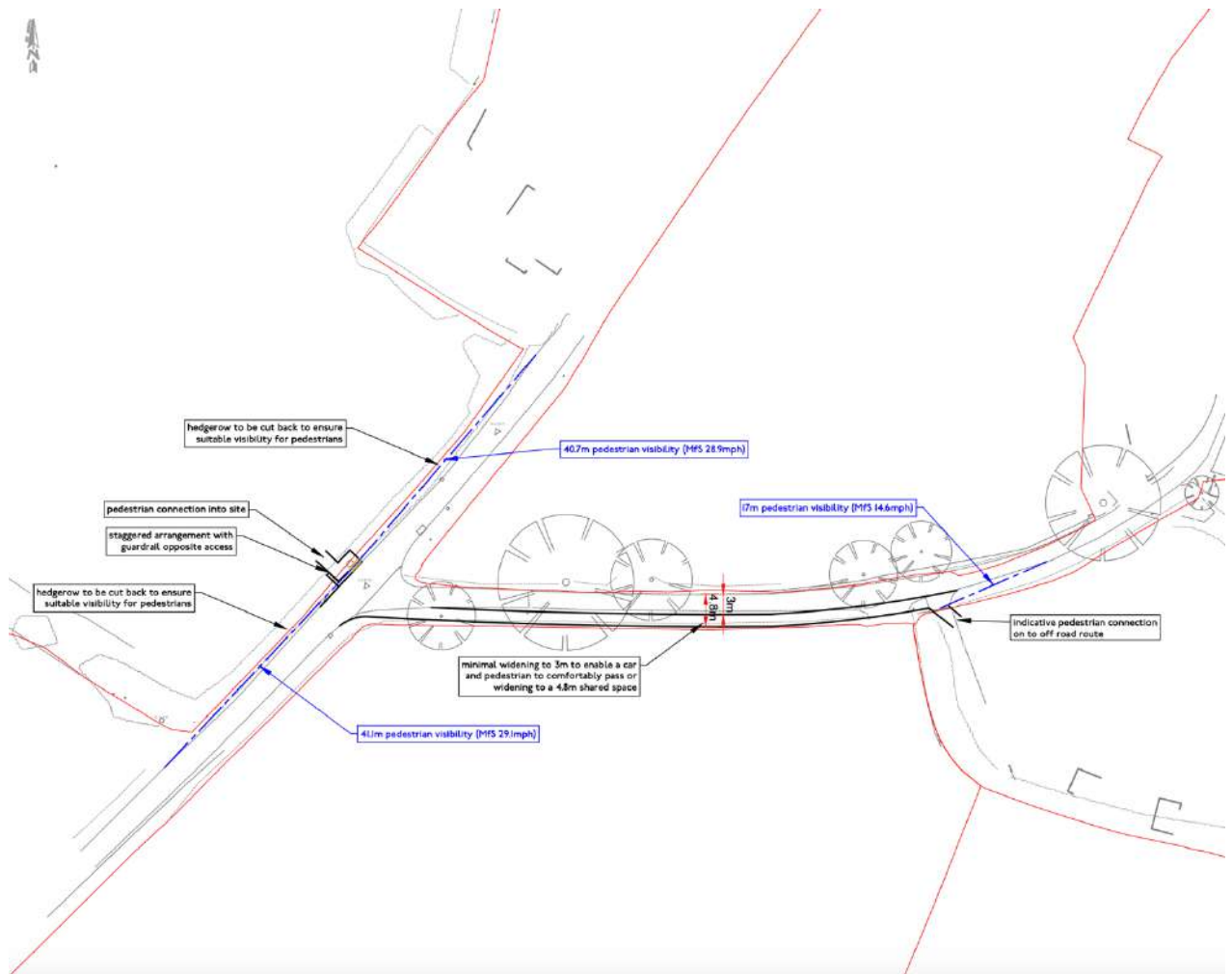
4.1.7 The results of the ATC survey show that Crown Lane, via Shore Lane, has minimal use and will result in minimal conflicting movements with pedestrians.

4.1.8 Vehicle speeds along Crown Lane are low and would be suitable for a shared space arrangement without the need for a segregated footway.

4.1.9 There may be a requirement to formally reduce the posted speed limit along Crown Lane to 20mph to formalise the arrangement as a shared space.

4.1.10 The proposed improvements for the pedestrian route along Shore Lane and Crown Lane are shown in [Figure 4.1](#) and in [Drawing J32-4468-PS-007](#) attached in [Appendix B](#).

Figure 4.1 : Shore Lane & Crown Lane Improvements



4.1.11 Subject to agreement with the Local Highway Authority there is potential to introduce some widening to Crown Lane to ensure a consistent width of 3m which will enable a car and a pedestrian to comfortably pass.

4.1.12 Alternatively, a 4.8m shared space will be required which appears to be deliverable without the need for third-party land.

4.1.13 With both options, the existing surface on Crown Lane will need to be improved, along with the extent of widening due to its current track like nature.

4.1.14 An ATC survey was undertaken on Wood Lane to understand vehicle speeds and volumes. A summary of the results are presented in [Table 4.3](#).

Table 4.3 : Wood Lane ATC Results

Direction	85 th Percentile Speed	AADT	Percentage HGVs
Eastbound	23.5mph	44	c.1%
Westbound	23.1mph	50	<2%

- 4.1.15 The results of the ATC survey show that vehicle flows are low along Wood Lane and will result in minimal conflicting movements with pedestrians.
- 4.1.16 Required visibility splays for a pedestrian crossing point on Wood Lane could be accommodated within Raby Estates' Land.
- 4.1.17 A signalised crossing will be required on Shrewsbury Road due to the limited extent of adopted highway reducing the available forward visibility required to provide an uncontrolled crossing point.
- 4.1.18 The land to the south of Wood Lane has a short frontage on to Shrewsbury Road which limits the opportunities to provide a suitable pedestrian crossing. On the eastern side of Shrewsbury Road there is a driveway and a section of c.1.0m wide footway in the location where a crossing would be required, meaning that a pedestrian crossing this location is undeliverable.
- 4.1.19 Land to the north of Wood Lane will be required to provide a signalised crossing in a suitable location.
- 4.1.20 The introduction of a footway on the northern side of Wood Lane can be delivered within Raby Estates' land. This will enable a crossing to be provided to the north of Wood Lane where the frontage on the eastern side of the road is suitable.
- 4.1.21 The introduction of the footway will require the realignment of the Wood Lane junction. This gives the opportunity to provide a perpendicular junction arrangement with improved visibility splays, although this will still not fully conform with current highway design standards.
- 4.1.22 Off-road sections of the route will need to be fully surfaced, drained and lit. A maximum gradient of 5% will be required along the route; a levels assessment has been undertaken which is discussed further in [Chapter 5](#).
- 4.1.23 Shropshire design guidance does not clearly set out lighting requirements for Public Footpaths. Whilst Shropshire will have standard lighting for highways, this may not be considered appropriate for the off road-route, with other forms of lighting columns potentially preferred.
- 4.1.24 At this stage it is reasonable to assume that some form of streetlighting can be delivered to ensure pedestrian safety, with the detail developed as the scheme progresses.

- 4.1.25 Pedestrian warning signs should be used where appropriate to alert drivers to the presence of pedestrians.
- 4.1.26 Within the field section of the off-road route, there is currently a marked PRow on-site which is not shown on the definitive map. As part of the proposals sections of this would need to be diverted onto the proposed route under S257 of the Town and Country Planning Act.
- 4.1.27 Given the existing quality of the route, with no surfacing, a poor stream crossing and a number of steps on the Wood Lane side of the stream, the proposed diversion would provide betterment for all users, however the entire route could not be diverted as some is outside the redline boundary, within third party land and therefore would not meet the threshold of being required to deliver the development.

5. Levels Assessment

- 5.1.1 A levels assessment has been undertaken to ensure that a footpath can be delivered at a 5% gradient, and to understand the resulting extent of earthworks required to deliver this.
- 5.1.2 The existing land appears to be around 10% gradient in the open fields and increases to around 20% close to the watercourse making the potential for large extents of earthworks possible.
- 5.1.3 As shown in **Figure 5.1** and in **Drawing CR-LE-GEN-XX-DR-CE-001** attached in **Appendix C**, the proposed route has been amended to 'snake' across the site in order to reduce the extent of earthworks required.

Figure 5.1 : Levels Assessment



5.1.4 Detailed flood modelling has been undertaken to understand the required bridge height and length to prevent the impact on any structures on the flood modelling.

6. Summary

6.1.1 Two routes have been considered in order to provide suitable pedestrian access to the proposed development site, one via Shrewsbury Road and one via land owned by the Raby Estate.

6.1.2 The walking routes to local amenities are shorter via the Shrewsbury Road route, however, they are still within acceptable walking distance via the off-road route.

6.1.3 Existing footway widths along Shrewsbury Road are below the absolute minimum width and there is no scope to provide additional widening within the existing carriageway width. As this has been raised by the Local Highway Authority in their pre-app response, an alternative route is likely to be required.

6.1.4 Improvements to Wood Lane to deliver the off-road route can be delivered with the Estates' land.

APPENDIX A

Shrewsbury Road Measurements

Filename: \\MACH\HOME\MODE DROBOX\PROJECT\MANCHESTER\2 PROJECTS\J324463\LAND AT SHORE LANE, CRESSAGE\1 GRAPHICS\1 CAD\2 SHEETS\J32-4463-PS-006.DWG
Last saved by: LUKE WHEELER Last Plotter: 2023-10-19

Project Management Initials: Designer: LCW Checked: MA Approved: ME

ISO A3 297mm x 420mm



transport planning

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e info@modetransport.co.uk
w www.modetransport.co.uk

- notes:
1. this drawing is to be read in conjunction with all other relevant drawings, any discrepancies, errors or omissions to be brought to the attention of overseeing organisation.
 2. all dimensions to be checked before commencement of work on site.
 3. all dimensions in metres unless otherwise stated.
 4. the design is subject to approval of shropshire county council.
 5. drawing based on os mapping.

issue/revision	date	issued	description
-	19/10/2023		
l/r			

client: raby estates
project: land at shore lane, cressage
project number: J324463
scale: 1:1000@A3
drawing title:
existing carriageway dimensions
drawing number:
J32-4463-PS-006

APPENDIX B

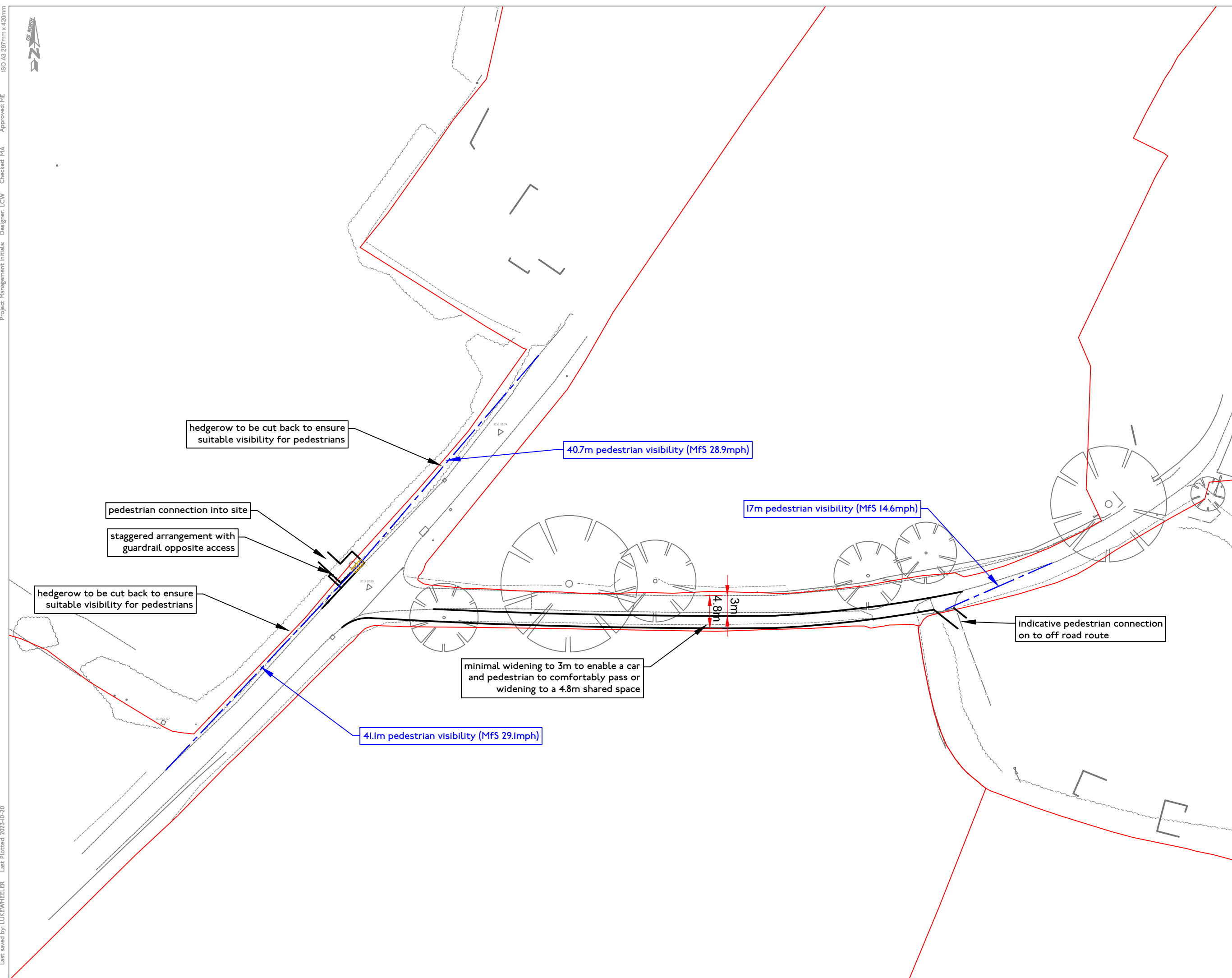
Off-road Route Improvements

ISO A3 297mm x 420mm
Approved: ME
Checked: MA
Designer: LCW
Project Management Initials:
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Last saved by: LUKE WHEELER Last Plotter: 2023-10-20



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 5. drawing based on os mapping.

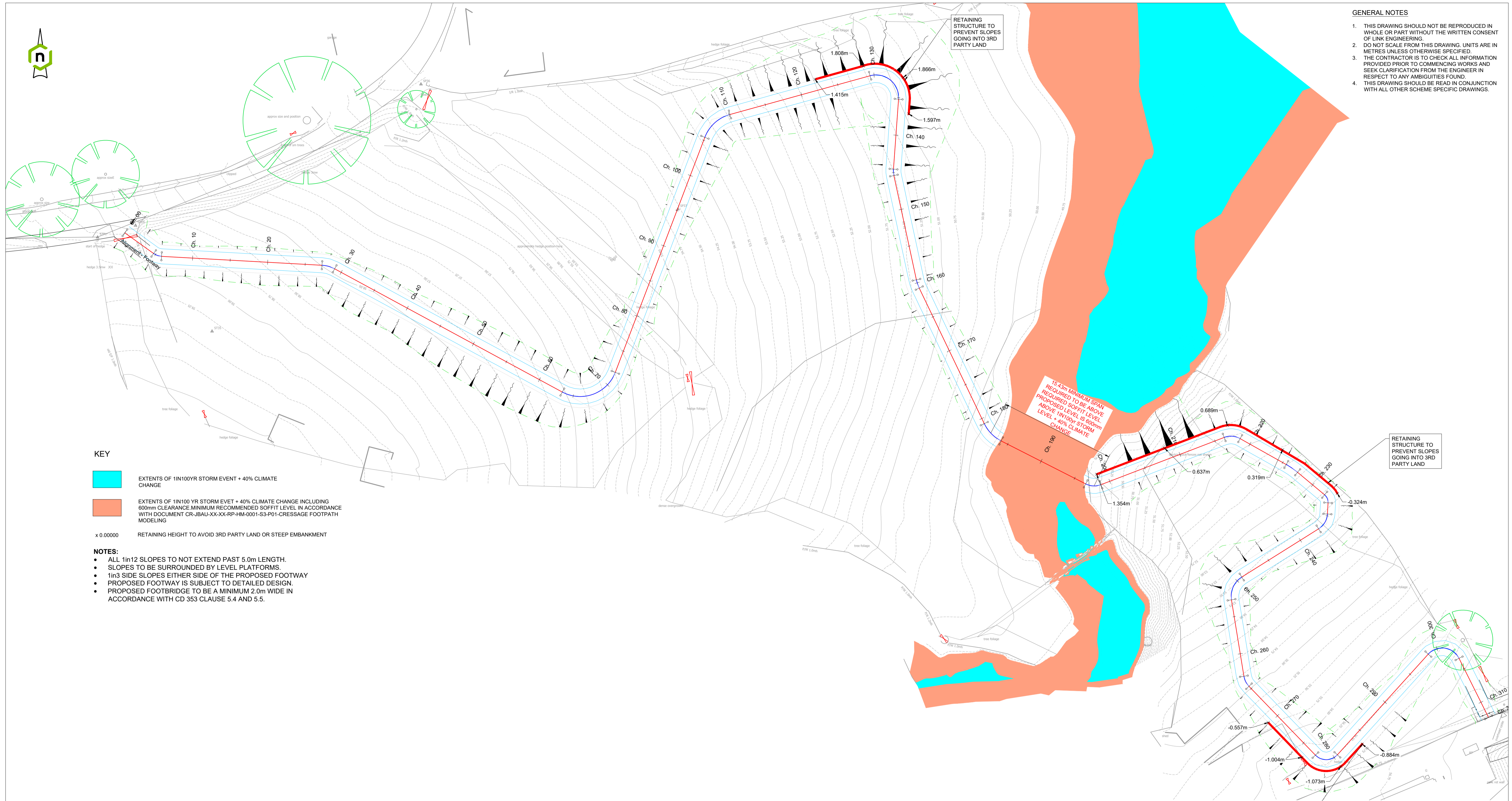
issue/revision

l/r	date	issued	description
-	19/10/2023		

client: raby estates
project: land at shore lane, cressage
project number: J324463
scale: 1:500@A3
drawing title: crown lane improvements
drawing number: J32-4463-PS-007

APPENDIX C

Levels Assessment



KEY

- EXTENTS OF 1IN100YR STORM EVENT + 40% CLIMATE CHANGE
- EXTENTS OF 1IN100 YR STORM EVET + 40% CLIMATE CHANGE INCLUDING 600mm CLEARANCE MINIMUM RECOMMENDED SOFFIT LEVEL IN ACCORDANCE WITH DOCUMENT CR-JBAU-XX-XX-RP-HM-0001-S3-P01-CRESSAGE FOOTPATH MODELING
- x 0.00000 RETAINING HEIGHT TO AVOID 3RD PARTY LAND OR STEEP EMBANKMENT

- NOTES:**
- ALL 1in12 SLOPES TO NOT EXTEND PAST 5.0m LENGTH.
 - SLOPES TO BE SURROUNDED BY LEVEL PLATFORMS.
 - 1in3 SIDE SLOPES EITHER SIDE OF THE PROPOSED FOOTWAY
 - PROPOSED FOOTWAY IS SUBJECT TO DETAILED DESIGN.
 - PROPOSED FOOTBRIDGE TO BE A MINIMUM 2.0m WIDE IN ACCORDANCE WITH CD 353 CLAUSE 5.4 AND 5.5.

- GENERAL NOTES**
1. THIS DRAWING SHOULD NOT BE REPRODUCED IN WHOLE OR PART WITHOUT THE WRITTEN CONSENT OF LINK ENGINEERING.
 2. DO NOT SCALE FROM THIS DRAWING. UNITS ARE IN METRES UNLESS OTHERWISE SPECIFIED.
 3. THE CONTRACTOR IS TO CHECK ALL INFORMATION PROVIDED PRIOR TO COMMENCING WORKS AND SEEK CLARIFICATION FROM THE ENGINEER IN RESPECT TO ANY AMBIGUITIES FOUND.
 4. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER SCHEME SPECIFIC DRAWINGS.

Rev.	Amendments	Date	By
P2	UPDATED TO INCLUDE HYDRAULIC MODELING	08.04.24	TJA
P1	INITIAL ISSUE	13.10.23	TJA

Client
MODE TRANSPORT PLANNING

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Project
LM3082 - CRESSAGE

Drawing
LEVEL ASSESSMENT 1of2

Scale @ A1
1:250

Drawn
TJA

Checked
KL

Rev
P2

CR-JBAU-XX-DR-CE-001 PRELIMINARY (S1)

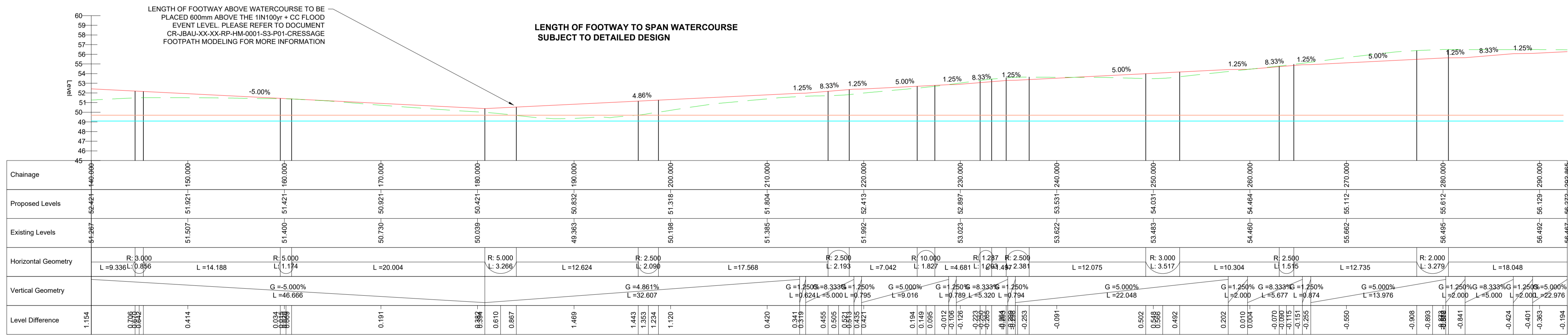
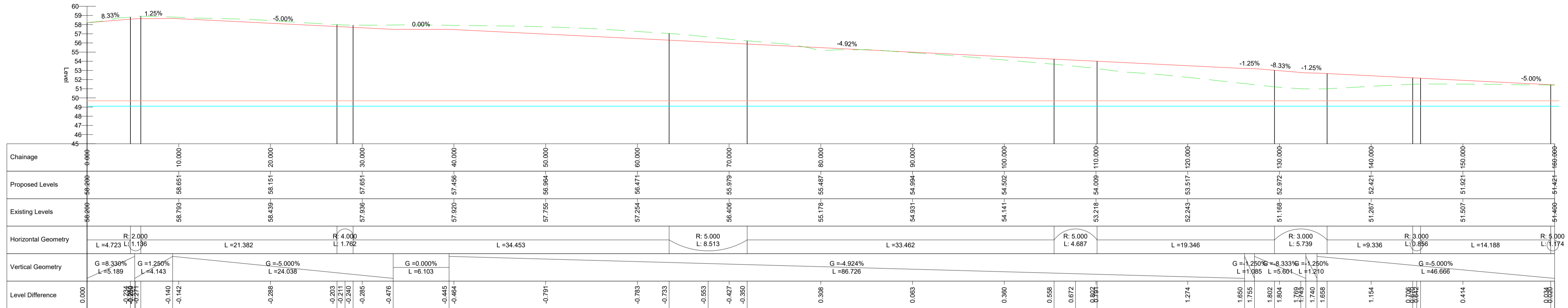
LONGSECTIONS KEY

- EXISTING GROUND LEVEL
- PROPOSED GROUND LEVEL
- 1IN100 YEAR STORM LEVEL + 40% CLIMATE CHANGE
- 1IN100 YEAR STORM LEVEL + 40% CLIMATE CHANGE + 60mm

GENERAL NOTES

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3. THE CONTRACTOR IS TO CHECK ALL INFORMATION PROVIDED PRIOR TO COMMENCING WORKS AND SEEK CLARIFICATION FROM THE ENGINEER IN RESPECT TO ANY AMBIGUITIES FOUND.
4. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER SCHEME SPECIFIC DRAWINGS.

ALIGNMENT - FOOTWAY - LONGSECTION (1)
SCALE: H 1:250, V 1:250, DATUM: 45.000



- NOTES:**
- ALL 1in12 SLOPES TO NOT EXTEND PAST 5.0m LENGTH.
 - SLOPES TO BE SURROUNDED BY LEVEL PLATFORMS.
 - 1in3 SIDE SLOPES EITHER SIDE OF THE PROPOSED FOOTWAY
 - PROPOSED FOOTWAY IS SUBJECT TO DETAILED DESIGN.
 - PROPOSED FOOTBRIDGE TO BE A MINIMUM 2.0m WIDE IN ACCORDANCE WITH CD 353 CLAUSE 5.4 AND 5.5.

Rev.	Amendments	Date	By
P2	UPDATED TO INCLUDE HYDRAULIC MODELING	08.04.24	TJA
P1	INITIAL ISSUE	13.10.23	TJA

Revisions

Client
MODE TRANSPORT PLANNING

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Project
LM3082 - CRESSAGE

Drawing
LEVEL ASSESSMENT 2of2

Scale @ A1
1:250

Drawn
TJA

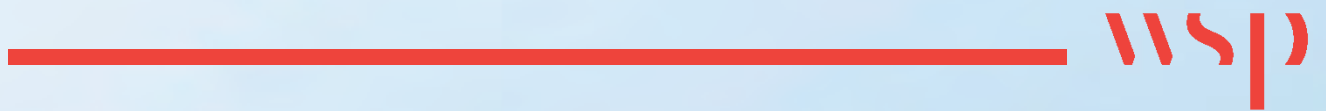
Checked
KL

Rev
P2

CRJLE-GEN-XX-DR-CE-002 PRELIMINARY (S1)

Appendix F

CRESSAGE PRELIMINARY SITE
ACCESS

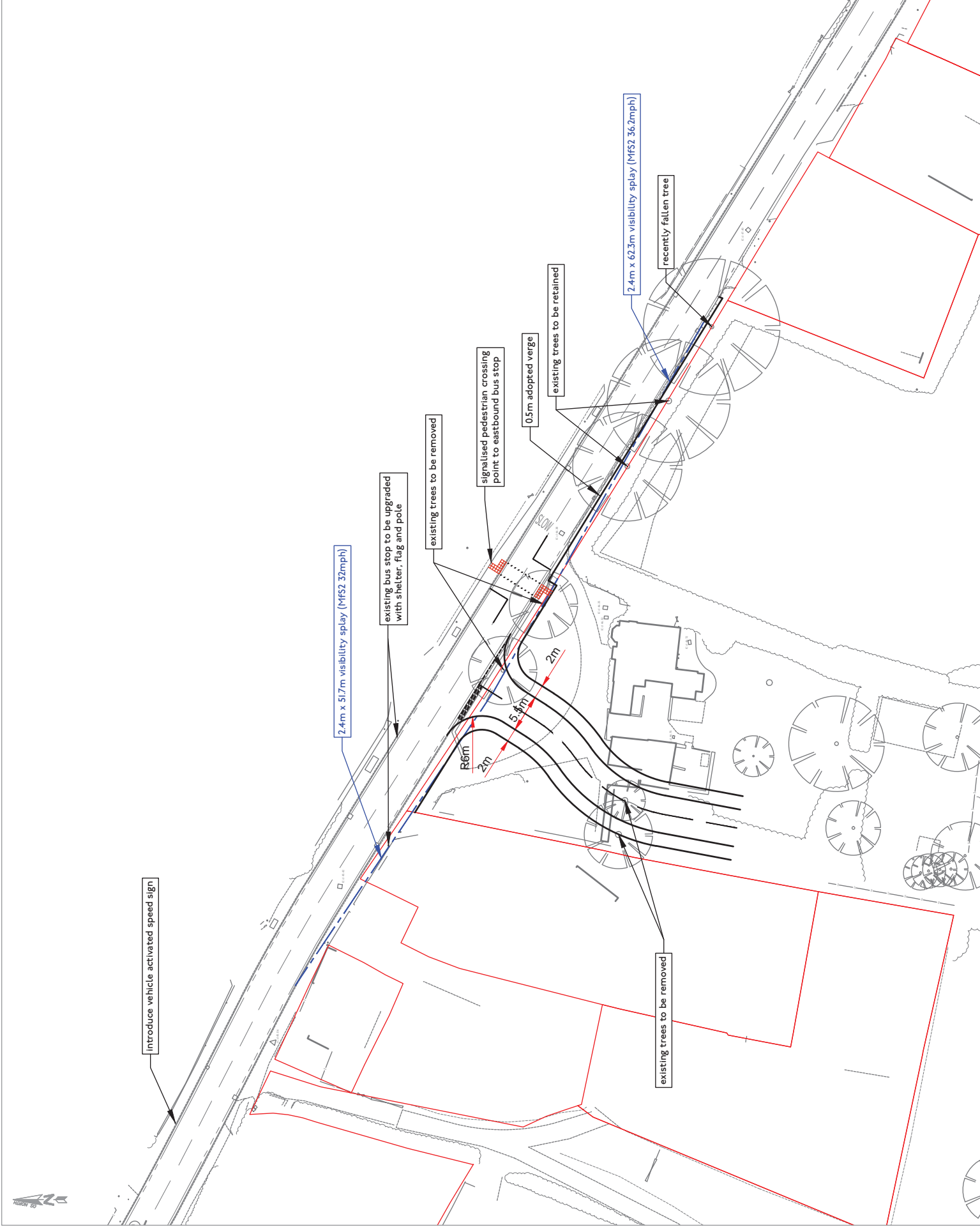


NOTES:

1. this drawing is to be read in conjunction with all other relevant drawings. any discrepancies, alterations or amendments should be referred to the attention of the issuing organisation.
2. all dimensions to be checked before commencement of work on site.
3. all dimensions in metres unless otherwise stated.
4. the design is subject to approval of appropriate authority sources.
5. drawing based on os mapping.

issue/revision	no	date	by	checked	description
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	2	15/10/2023	MA	MA	issued
	3	16/10/2023	MA	MA	issued

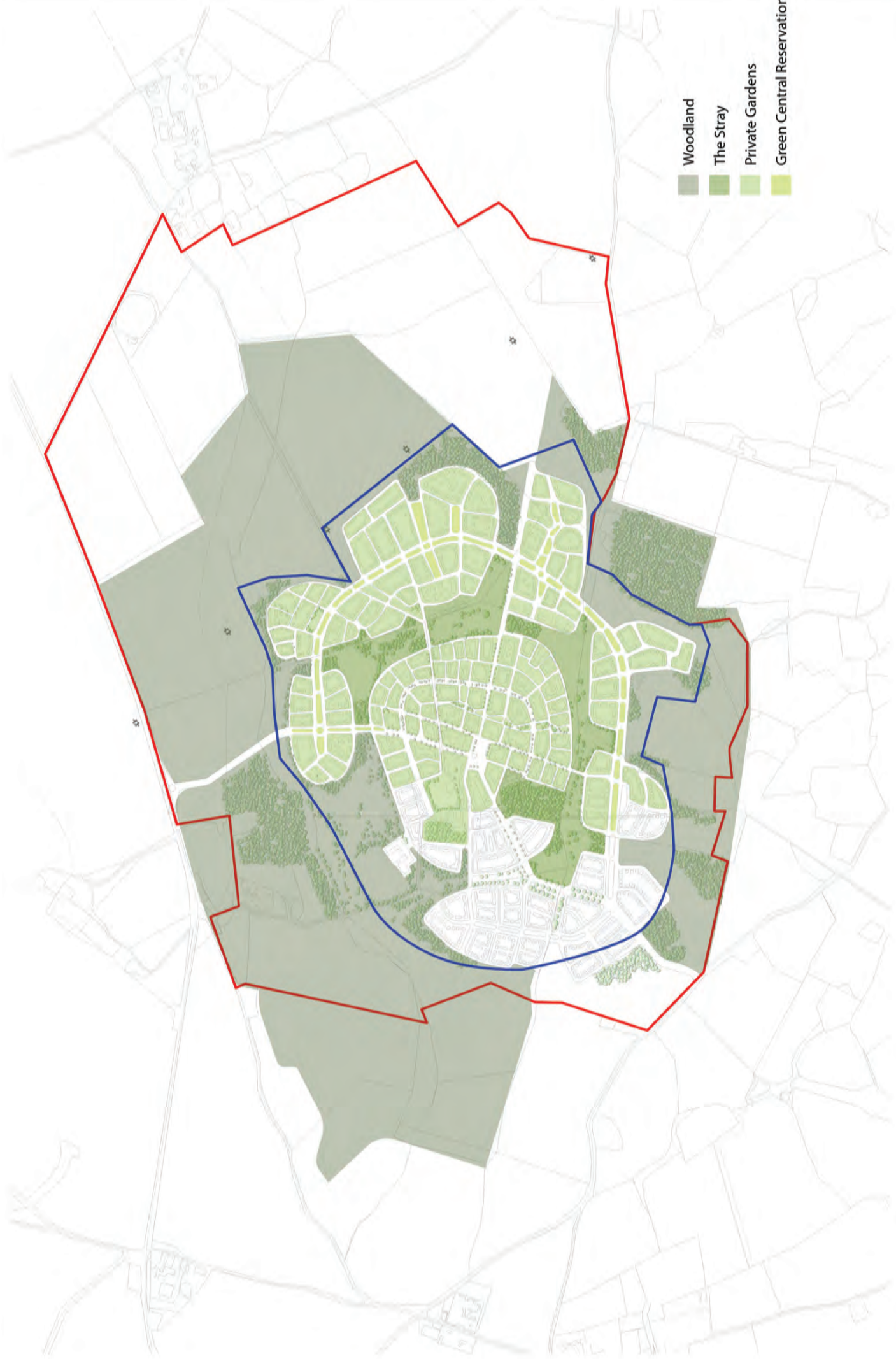
client: raby estates
 project: Land at shore lane, crassage
 project number: J324463
 scale: 1:250@A3
 drawing title: preliminary site access
 drawing number: J32_4463-S1001







- Woodland
- The Stray
- Neighbourhood Area
- Settlement Core
- Community Uses
- Bell Brook



- Woodland
- The Stray
- Private Gardens
- Green Central Reservation



