

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

**ID40: Stage 2 Matters, Issues and  
Questions**

**Matter 23**



## **Matter 23 - Wem Place Plan Area (policy S17) – see MM122**

***Issue: Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.***

### **Questions: Place Plan Area**

***Question 1.*** *Is the approach taken to development in the Place Plan Area, justified, effective and consistent with national policy?*

### **Shropshire Council Response:**

- 1.1. Shropshire Council considers the proposed approach to development in the Wem Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Wem Place Plan area is established within draft settlement policies S17.1-S17.4 and then appropriately expanded upon through the other policies of the draft Shropshire Local Plan.
- 1.3. These draft settlement policies align with and implement the proposed strategic approach to the level and distribution of development across Shropshire – particularly the principle of urban focus; but crucially are also responsive to the characteristics, constraints, and opportunities of the various settlements in the Place Plan area.
- 1.4. In positively responding to the characteristics, constraints and opportunities of the settlements in the Wem Place Plan area, the draft Shropshire Local Plan identifies Wem, Clive, Hadnall, Shawbury, Grinshill, and Harmer Hill, and Edstaston, Quina Brook, Northwood, Newtown, Tilley and Aston (combined) as locations to accommodate development. Specifically:
  - a. Wem is proposed to be identified as a Key Centre where growth will respond to local needs and contribute towards achieving strategic growth objectives in the north-east of the County consistent with the requirements of Policy S17.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Ellesmere envisage the delivery of around 600 dwellings and 6ha of employment land between 2016 and 2038.
  - b. Clive, Hadnall and Shawbury are significant rural service centres, as such it is proposed they will be identified as Community Hubs where new development will respond to local needs consistent

with Policy S17.2, Policy SP8, and other relevant policies of the Shropshire Local Plan.

- i. Proposed development guidelines for Clive envisage the delivery of around 30 dwellings between 2016 and 2038.
    - ii. Proposed development guidelines for Hadnall envisage the delivery of around 125 dwellings between 2016 and 2038.
    - iii. Proposed development guidelines for Shawbury envisage the delivery of around 150 dwellings between 2016 and 2038.
  - c. Grinshill, Harmer Hill and Edstaston with Quina Brook, Northwood, Newtown, Tilley and Aston (combined) are all proposed to be identified as Community Clusters where new development will respond to local needs, consistent with the requirements of Policy S17.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of these settlements, no specific development guidelines or allocations are proposed.
- 1.5. In identifying site allocations to contribute to the achievement of the strategies proposed for Wem, Clive, Hadnall and Shawbury, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
- 1.6. Through this process proposed residential site allocations were identified at: Wem (WEM010, WEM025 and WEM033); Clive (CLV012 & CLV018); Hadnall (HDL006) and Shawbury (SHA019). This assessment work is summarised within Appendix I (SD006.19) of the of Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.7. The Wem Place Plan area does not have any realistic functional relationship to the Black Country, due to its geographic location within Shropshire. As a result, no settlement in the Wem Place Plan area was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.8. Shropshire Council considers that development proposals in the Place Plan area will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire; contribute to the achievement of sustainable development that meets the needs of all groups within the communities of the Place Plan area; and support the long-term sustainability of Shropshire.
- 1.9. The Council considers the proposed approach to development in the Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.

- 1.10. In particular, it is responsive to the conclusions of:
  - a. Sustainability Appraisal and Site Assessment processes (SD006.01-SD006.22 and GC44).
  - b. The Hierarchy of Settlements (EV060).
  - c. Assessments of the characteristics of settlements, including the Market Town Profiles (most recent publications EV073.01- EV073.17).
  - d. Conclusions of infrastructure planning processes (most recent publication is GC54).
- 1.11. The Council considers the proposed approach to development in the Place Plan area is effective as it includes a clear strategy and detailed criteria to manage development over the entire geography. This ensures a shared understanding amongst communities, developers and decision makers. As such, it is considered implementable and deliverable over the proposed plan period.
- 1.12. The Council considers the proposed approach to development in the Place Plan area is consistent with national policy. In particular it:
  - a. Conforms with the principles of plan making in Chapter 3 of the 2021 National Planning Policy Framework (NPPF).
  - b. Supports delivery of sufficient and appropriate forms of housing, contributing to achievement of the housing needs of all groups within the communities of the Place Plan area, consistent with Chapter 5 of the NPPF.
  - c. Supports the delivery of sufficient and appropriate forms of employment within the Place Plan area, consistent with Chapter 6 of the NPPF.
  - d. Promotes the health and wellbeing of communities within the Place Plan area, consistent with Chapter 8 of the NPPF.
  - e. Ensures the vitality of local centres and supports access to and use of sustainable transport, services and facilities, consistent with Chapter's 7, 9 and 10 of the NPPF.
  - f. Positively responds to the built and natural environment, and the challenge of climate change, consistent with Chapter's 14-16 of the NPPF.

### **Questions: Site Allocation WEM010 – Land off Pym's Road, Wem**

**Question 1.** *What is the background to the site allocation? How was it identified and which options were considered?*

#### **Shropshire Council Response:**

- 1.1. This proposed allocation lies to the north west of the town of Wem. It consists of agricultural field directly adjoining the SAMDev Plan

saved residential allocation (WEM003). It is bounded by Lowe Hill Road on two sides, a hedgerow boundary to the west and the adopted Plan residential allocation to the south which, together with an additional area of land to the west of the allocation, has outline consent for the erection of up to 100 dwellings which was given at appeal.

- 1.2. To inform the identification of proposed site allocations, including WEM010, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability, size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were

reached about their proposed status within the draft Shropshire Local Plan.

- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Wem Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 42 sites were considered at Wem all of which were considered within Stage 3 of the site assessment process.
- 1.11. WEM010 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WEM010 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken to identify proposed allocation WEM010. These objections are summarised in SD014.01 and GC4o. They included:
  - a. Better alternative sites are available. All proposed allocation sites to the north west of Wem are subject to infrastructure capacity constraints, including highway congestion/pinch points, being on the opposite side of the town from main employment areas,

strategic road links and the railway station. There are also surface water and foul water constraints: Shropshire Council considers that the proposed development strategy for Wem has given due consideration to the settlement characteristics, constraints and opportunities, and that the proposed allocations that contribute towards achieving the strategy, are appropriate, effective, sustainable and deliverable.

- b. That proposed allocation of WEM010 as a second phase of the existing allocated site WEM003, which has remained undeveloped being allocated for a number of years, is subject to same constraints and is similarly not deliverable: Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of WEM010 as a proposed allocation.

1.14. In conclusion, Shropshire Council considers that WEM010 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

**Question 2.** *What is the scale and type/mix of uses proposed?*

**Shropshire Council Response:**

- 2.1. WEM010 is proposed to be allocated for residential development. This site is some 4.17ha in size and the approximate site provision figure is some 120 dwellings.
- 2.2. Detailed development guidelines within Schedule S17.1(i) of draft Policy S17.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

**Question 3.** *What is the basis for this and is it justified?*

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S17.1(i) of draft Policy S17.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further

information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM010.

- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Question 4.** *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

**Shropshire Council Response:**

- 4.1. No planning application has been received in relation to the site WEM010.

**Question 5.** *What are the benefits that the proposed development would bring?*

**Shropshire Council Response:**

- 5.1. WEM010 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WEM010 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Wem and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Ensuring the comprehensive development of the proposed site allocation (WEM010) and existing adopted Local plan site



allocation (WEM003) – including highway improvements and provision of appropriate vehicular access from Pyms Road seeking to serve both phases and provide linkage between the two components of the site (WEM010 and existing SAMDev allocation WEM003).

- b. Safeguarding of protected species, retention and enhancement of trees and hedgerows and ecological interest through increased habitat connectivity.
- c. Provision of green infrastructure– including landscaping to integrate the development into the landscape and soften the existing urban edge along Lowe Hill Road.
- d. Ability for development to consider and respect the sites heritage and heritage assets within wider area.
- e. Remediation of contaminated land where required.
- f. Ability to provide green infrastructure in association with exclusion of development from areas subject to flood risk and a sustainable drainage and water management strategy.

5.5. More generally, it is also considered that development of WEM010 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

**Question 6.** *What are the potential adverse impacts of developing the site? How could they be mitigated?*

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing WEM010 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM010.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEM010 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WEM010 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There are significant trees and hedgerows present and potential ecological interest. As such, site guidelines require ecological survey and that protection and retention of significant trees, hedgerows and priority habitat. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - a. Site guidelines provide for design, layout and landscaping of development, to integrate development into landscape and consider local heritage assets. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
  - b. The site, as would others in Wem, falls within the area of where development has potential to impact the Cole Mere Ramsar site and on the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site through increased recreational pressures. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on Cole Mere and Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. Habitats Regulations Assessment (HRA) was also required to assess nitrogen oxide pollution from increased road traffic (in combination) on Sweat Mere and Crose Mere and Clarepool Moss. The draft Shropshire Local Plan is supported by a HRA (SD008.01) which has informed the Plan and requirements of draft Policy S17.1. This policy includes a requirement for mitigation measures will be to remove any adverse effect from increased recreational pressure arising from development in Wem on the integrity of the Cole Mere Ramsar site and Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents. DP15 specifically sets out expectations in respect of open space provision where such an impact has been identified, including appropriate consideration of an increase in the amount of open space provided by development.
  - c. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - b. The site WEM010 is within an area of medium landscape sensitivity and medium sensitivity for housing This has been appropriately considered within the site assessment. Furthermore, site guidelines include a range of expectations on

site design and layout to ensure they positively respond to and mitigate this matter.

- d. Remediation of contaminated land will need to be addressed. Draft Policy DP18 sets out requirements for pollution and public amenity.
- e. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Wem This has been appropriately considered within the site assessment.
- f. The site is located within a mineral safeguarding area (MSA), as is the majority of Wem. Draft Policy DP29 addresses mineral safeguarding and establishes expectations for development in MSA's.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM010.
- 7.4. With specific regard to flood risk at WEM010, in summary:
  - a. With regard to fluvial flood risk, proposed allocation WEM010 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 1% of proposed allocation WEM010 is located within the 100 year surface flood risk zones and around 4% of proposed allocation WEM010 is located within the 1,000 year surface flood risk zone.

- 7.5. The proposed site guidelines for WEM010 within Schedule S17.1(i) of draft Policy S1.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WEM010. It concluded that the site WEM010 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

**Question 8.** *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WEM010 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM010.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEM010 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WEM010 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic

Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 8.5. The site guidelines include:
- a. Ensuring the comprehensive development of the site WEM010 and integration with existing SAMDev site allocation WEM003.
  - b. Seeking appropriate access off Pym's Road accompanied by necessary highway improvements and linkage between the two sites (WEM010 & WEM003).
  - c. Safeguarding of protected species, retention and enhancement of trees and hedgerows and ecological interest, including through increased habitat connectivity.
  - d. Providing green infrastructure links between the site and the wider area to integrate the development into the landscape and soften the existing urban edge.
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
  - f. Remediation of contaminated land where required.
  - g. Consideration of heritage assets.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WEM010. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.

- 8.9. Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

**Question 9.** *Is the site realistically viable and deliverable?*

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site WEM010 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that, as confirmed in the assessment of the housing land supply in Shropshire (GC47), that the promoter of the WEM010 has stated, *'On behalf of the landowner, I can confirm that the proposed allocation on WEM010 is a viable and deliverable site'*.
- 9.4. The Council would also note that this is a greenfield site allocation in the same ownership as the adjoining allocated site (WEM003) which has had planning permission granted at appeal.

**Question 10.** *What is the expected timescale and rate of development and is this realistic?*

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation WEM010 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2032/33. The Council

also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.

10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

**Question 11.** *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation WEM010 is entirely appropriate and there is no justification for its amendment.
- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM010.
- 11.3. The site is adjacent to the development boundary and adjoins the existing SAMDev residential allocation (WEM003) and is therefore considered a natural extension to the settlement. A hedgerow provides a strong defensible boundary to the western edge of the site, with Lowe Hill Road providing boundaries to the north, east, providing containment together with the existing housing allocation which lies directly to the south.

**Question 12.** *Are the detailed policy requirements effective, justified and consistent with national policy?*

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WEM010 within Schedule S1.17(i) of draft Policy S17.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WEM010; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information

on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM010.

- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WEM010 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of WEM010.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on WEM010, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.



- f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

12.8. Representations made during the Regulation 19 Pre-Submission Consultation are summarised in SD014.01 and GC4o. The main objections sought that alternative promoted sites should be brought forward for development rather than relating to policy requirements.

### **Questions: Site Allocation WEM025 – Land off Trentham Road, Wem**

**Question 1.** *What is the background to the site allocation? How was it identified and which options were considered?*

#### **Shropshire Council Response:**

- 1.1. This proposed allocation lies to the north west edge of the town of Wem. It consists of agricultural field adjoining existing residential development in the town and lies directly to the north east of the proposed residential allocation WEM010. It is bounded by residential properties and roads to the eastern, western and southern sides with a hedgerow boundary to the northern boundary.
- 1.2. To inform the identification of proposed site allocations, including WEM025, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or

Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Wem Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 42 sites were considered at Wem all of which were considered within Stage 3 of the site assessment process.
- 1.11. WEM025 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.

- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WEM025 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken to identify proposed allocation WEM025. These objections are summarised in SD014.01 and GC4o. They included:
- a. Better alternative sites are available. All proposed allocation sites to the north west of Wem are subject to infrastructure capacity constraints, including highway congestion/pinch points as they are on the opposite side of the town from main employment areas, strategic road links and the railway station.: Shropshire Council considers that the proposed development strategy for Wem has given due consideration to the settlement characteristics, constraints and opportunities, and that the proposed allocations that contribute towards achieving the strategy, are appropriate, effective, sustainable and deliverable.
  - b. There are surface water and foul water constraints: Shropshire Council considers proposed allocations have been identified through a site assessment process including appropriate consideration of issues such a surface water and drainage, with policy DP19 addressing foul drainage infrastructure.
  - c. That proposed allocation of WEM025 should be reconsidered as an allocation as it has recognised ecological value and numerous mitigation measures are identified as needed: Proposed allocations have been identified through a site assessment process including appropriate consideration of issues such as ecology. The process undertaken and conclusions reached are document through the site assessment process which fully justifies the identification of WEM025 as a proposed allocation.
- 1.14. In conclusion, Shropshire Council considers that WEM025 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken, and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

**Question 2.** *What is the scale and type/mix of uses proposed?*

**Shropshire Council Response:**

- 2.1. WEM025 is proposed to be allocated for residential development. This site is some 1.27ha in size and the approximate site provision figure is some 30 dwellings.
- 2.2. Detailed development guidelines within Schedule S17.1(i) of draft Policy S17.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

**Question 3.** *What is the basis for this and is it justified?*

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S17.1(i) of draft Policy S17.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM025.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Question 4.** *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

**Shropshire Council Response:**

- 4.1. No planning application has been made in respect of the proposed residential allocation of the site.

**Question 5.** *What are the benefits that the proposed development would bring?*

**Shropshire Council Response:**

- 5.1. WEM025 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WEM025 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Wem and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Highway improvements and provision of appropriate vehicular access from Trentham Road.
  - b. Low density development to reflect local character, to safeguard and enhance habitats and protected species, and to facilitate opportunities to achieve increased habitat connectivity.
  - c. Retention and enhancement of trees, hedgerows and priority habitat.
  - d. Development to consider and respect the sites heritage and heritage assets within wider area.
  - e. Ability to provide green infrastructure in association with exclusion of development from areas subject to flood risk and a sustainable drainage and water management strategy.
- 5.5. More generally, it is also considered that development of WEM025 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

**Question 6.** *What are the potential adverse impacts of developing the site? How could they be mitigated?*

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing WEM025 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM025.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEM025 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WEM025 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. There are protected and other significant trees and hedgerows present and ecological interest. As such, site guidelines require ecological survey and that protection and retention of significant trees, hedgerows and priority habitat. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. Design, layout and landscaping of development, to integrate development into landscape and consider heritage issues. Heritage Assessment required at planning application stage. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
  - b. The site, as would others in Wem, falls within the area of where development has potential to impact the Cole Mere Ramsar site and on the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site through increased recreational pressures. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on Cole Mere and Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. Habitats Regulations Assessment (HRA) was also required to assess nitrogen oxide pollution from increased road traffic (in combination) on Sweat Mere and Crose Mere and Clarepool Moss. The draft Shropshire Local Plan is supported by a HRA

(SD008.01) which has informed the requirements of draft Policy S17.1. This policy includes a requirement for mitigation measures will be to remove any adverse effect from increased recreational pressure arising from development in Wem on the integrity of the Cole Mere Ramsar site and Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents. DP15 specifically sets out expectations in respect of open space provision where such an impact has been identified, including appropriate consideration of an increase in the amount of open space provided by development.

- c. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- d. The site WEM0025 is within an area of medium landscape sensitivity and medium sensitivity for housing. This has been appropriately considered within the site assessment. Furthermore, site guidelines include a range of expectations on site design and layout to ensure they positively respond to and mitigate this matter.
- e. Design and layout of development will need to minimise noise impact from adjacent road. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- f. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Wem This has been appropriately considered within the site assessment.
- g. The site is located within a mineral safeguarding area (MSA), as is the majority of Wem. Draft Policy DP29 addresses mineral safeguarding and establishes expectations for development in MSAs.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.

- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM025.
- 7.4. With specific regard to flood risk at WEM025, in summary:
- a. With regard to fluvial flood risk, proposed allocation WEM025 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 2% of proposed allocation WEM025 is located within the 30 year surface flood risk zone, around 3% of proposed allocation WEM025 is located within the 100 year surface flood risk zone and around 4% of proposed allocation WEM0025 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for WEM025 within Schedule S17.1(i) of draft Policy S1.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WEM025. It concluded that the site WEM025 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.



**Question 8.** *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WEM025 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM025.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEM025 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WEM025 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site off Trentham Road and any necessary highway infrastructure improvements.
  - b. Low density development to reflect local character and site constraints.
  - c. Safeguarding of protected species, retention and enhancement of trees and hedgerows and ecological interest including through increased habitat connectivity.
  - d. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
  - e. Consideration of heritage assets.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.

- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WEM025. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.9. Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

**Question 9.** *Is the site realistically viable and deliverable?*

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site WEM025 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. The Council would note that, that as stated in the site promoters correspondence, provided in Appendix 26 of the Viability Topic Paper (EV113), for the WEM025, *'With regard to the sites listed ....I can confirm that further to the work undertaken to date that they remain very much viable and deliverable with regard to the Policy requirements identified within the Regulation 19 Pre Submission Draft Shropshire Local Plan We will continue to undertake further diligence work in this respect '.*

- 9.4. The Council would also note that this is a greenfield site allocation. Shropshire Council considers that there are no known impediments to the achievability or viability of the site and that it is suitable, achievable viable and deliverable.

**Question 10.** *What is the expected timescale and rate of development and is this realistic?*

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation WEM025 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2027/28. The Council also anticipates that development will progress at a rate of 15 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

**Question 11.** *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation WEM025 is entirely appropriate and there is no justification for its amendment.
- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM025.
- 11.3. The site is adjacent to the development boundary, adjoined by residential development on 3 sides. The site is moderately sized and provides an opportunity to round off the settlement to the north-west in contained location and is considered to be a natural extension to the settlement.

**Question 12.** *Are the detailed policy requirements effective, justified and consistent with national policy?*

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WEM025 within Schedule S1.17(i) of draft Policy S17.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WEM025; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM025.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WEM025 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of WEM025.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on WEM025, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing

- requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Representations made during the Regulation 19 Pre-Submission Consultation are summarised in SD014.01 and GC4o. There was a specific objection to the inclusion of the site needing to be supported by measures to mitigate the site’s ecological constraints.
- 12.9. Shropshire Council considers that proposed allocations identified to achieve the development strategy for Wem are appropriate and that due consideration has been given to the site characteristics, opportunities and constraints and that ecological considerations are appropriately dealt with by policy requirements.

**Questions: Site Allocation WEM033 – Land off Whitchurch Road, Wem**

**Question 1.** *What is the background to the site allocation? How was it identified and which options were considered?*

**Shropshire Council Response:**

- 1.1. This proposed allocation lies to the north of the town of Wem and is located directly to the east of the B4376 Whitchurch Road. It consists of an agricultural field bounded by hedgerows with existing residential development to its southern boundary.
- 1.2. To inform the identification of proposed site allocations, including WEM033, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).

- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Wem Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 42 sites were considered at Wem all of which were considered within Stage 3 of the site assessment process.
- 1.11. WEM033 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WEM033 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken to identify proposed allocation WEM033. These objections are summarised in SD014.01 and GC4o.
- 1.14. They included that better alternative sites are available. The proposed allocation of WEM033 is not justified as it subject to highways infrastructure constraints.
- 1.15. Shropshire Council considers that proposed allocations have been identified through a site assessment process which included consideration of issues such as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape and visual sensitivity. This site assessment process fully justifies the identification of WEM033 as a proposed allocation.
- 1.16. In conclusion, Shropshire Council considers that WEM033 was identified through a proportionate and robust site assessment

process which effectively summarises the site assessment process undertaken, and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

**Question 2.** *What is the scale and type/mix of uses proposed?*

**Shropshire Council Response:**

- 2.1. WEM033 is proposed to be allocated for residential development. This site is some 2.99ha in size and the approximate site provision figure is some 60 dwellings.
- 2.2. Detailed development guidelines within Schedule S17.1(i) of draft Policy S17.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

**Question 3.** *What is the basis for this and is it justified?*

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S17.1(i) of draft Policy S17.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM033.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Question 4.** *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

**Shropshire Council Response:**

- 4.1. No planning application has yet been received in relation to the residential development of site WEM033.



**Question 5.** *What are the benefits that the proposed development would bring?*

**Shropshire Council Response:**

- 5.1. WEM033 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WEM033 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Wem and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Provision of appropriate vehicular access from Whitchurch Road and accompanying necessary highway improvements.
  - b. Provision of local traffic calming measures with potential extension of the speed limit zone.
  - c. Footpath extension to encourage pedestrian movements from the site to the town.
  - d. Safeguarding and enhancement of habitats, trees and hedgerows.
  - e. Provision of green infrastructure in association with exclusion of development from areas subject to flood risk and a sustainable drainage and water management strategy.
- 5.5. More generally, it is also considered that development of WEM033 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

**Question 6.** *What are the potential adverse impacts of developing the site? How could they be mitigated?*

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing WEM033 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM033.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEM033 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WEM033 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. There are significant trees and hedgerows present and ecological interest. As such, site guidelines protection and enhancement of trees, hedgerows and priority habitat. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - b. The northern and eastern site boundaries form an Environmental Network to be protected and buffered from development. Site guidelines provide for low density development and protection and enhancement of trees, hedgerows and habitats.
  - d. Heritage assessment needed with any planning application to identify any archaeological interest. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
  - e. The site, as would others in Wem, falls within the area of where development has potential to impact the Cole Mere Ramsar site and on the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site through increased recreational pressures. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on Cole Mere and Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. Habitats Regulations Assessment (HRA) was also required to assess nitrogen oxide pollution from increased road traffic (in combination) on Sweat Mere and Crose Mere and Clarepool Moss.

The draft Shropshire Local Plan is supported by a HRA (SD008.01) which has informed the requirements of draft Policy S17.1. This policy includes a requirement for mitigation measures will be to remove any adverse effect from increased recreational pressure arising from development in Wem on the integrity of the Cole Mere Ramsar site and Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents. DP15 specifically sets out expectations in respect of open space provision where such an impact has been identified, including appropriate consideration of an increase in the amount of open space provided by development.

- f. A component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- g. The site WEM0033 is within an area of medium landscape sensitivity and medium sensitivity for housing. This has been appropriately considered within the site assessment. Site guidelines provide for low density development to reflect edge of settlement location.
- h. Noise associated with the adjoining Whitchurch Road to the west to be addressed by house and site design and layout. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- i. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Wem This has been appropriately considered within the site assessment.
- j. The site is located within a mineral safeguarding area (MSA), as is the majority of Wem. Draft Policy DP29 addresses mineral safeguarding and establishes expectations for development in MSAs.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.

- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM033.
- 7.4. With specific regard to flood risk at WEM033, in summary:
- a. With regard to fluvial flood risk, proposed allocation WEM033 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 1% of proposed allocation WEM033 is located within the 30 year surface flood risk zones, around 4% of proposed allocation WEM033 is located within the 100 year surface flood risk zone and around 17% of proposed allocation WEM033 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for WEM033 within Schedule S17.1(i) of draft Policy S1.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WEM033. It concluded that the site WEM033 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

**Question 8.** *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WEM033 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM033.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEM033 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WEM033 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site off Whitchurch Road combined with any required highway improvements and traffic calming measures.
  - b. Extending footpath to encourage pedestrian access to services and facilities.
  - c. Low density development in recognition of site location and characteristics.
  - d. Safeguarding, retention and enhancement of habitats, trees and hedgerows.
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and

construction of the development and developer contributions associated with the development.

- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WEM033. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that "*new development should only take place where there is sufficient existing infrastructure capacity available...*" or where "*...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means.*" It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.9. Other draft policies of particular relevance include:
  - a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

**Question 9.** *Is the site realistically viable and deliverable?*

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site WEM033 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. The Council would note that, the site promoters of WEM033 in their Regulation 19 Representation (A0009) stated that, "*JR Planning & Development supports the allocation of site WEM033 and confirms that it is available, deliverable and achievable*".

**Question 10.** *What is the expected timescale and rate of development and is this realistic?*

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation WEM033 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2033/34 and continue until 2035/36. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

**Question 11.** *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation WEM033 is entirely appropriate and there is no justification for its amendment.
- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM033.
- 11.3. The site represents a natural location for an extension to the town. It is adjacent to the town's development boundary and is accessed by the main arterial road to the north of the town which forms the western boundary to the site. It adjoins existing residential development to the south and is otherwise bounded by hedgerows with associated watercourses along the northern and eastern boundaries.

**Question 12.** *Are the detailed policy requirements effective, justified and consistent with national policy?*

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WEM033 within Schedule S1.17(i) of draft Policy S17.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WEM033; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEM033.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WEM033 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of WEM033.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on WEM033, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.



- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
- c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
- d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
- e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation, which are summarised in SD014.01 and GC4o, included objections to the specific site guidelines proposed for WEM033 namely that: the site housing guideline is too low and should be increased to up to 90 dwellings (offset by removing WEM025). Shropshire Council identifies within paragraph 6 of draft Policy S17.1 that site provision figures are approximate but however considers that at this stage are appropriate. The draft site guidelines for WEM033 within Schedule S17.1(i) of draft Policy S17.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified and set out in response to questions 1 and 7, including in respect of flood risk and water management and other constraints which will be addressed by low density development.

**Questions: Site Allocation CLV012 & CLV018 – Land off Flemley Park Farm, High Street, Clive and adjacent to the Bungalow**

**Question 1.** *What is the background to the site allocation? How was it identified and which options were considered?*

**Shropshire Council Response:**

- 1.1. This proposed allocation lies to the east of the village of Clive. It consists of the components of three agricultural fields most closely associated with the built form of the village. It is bounded by the High Street to the north, a residential curtilage to the west, a residential property curtilage and agricultural field boundary to the east, and the extent of the proposed allocation to the south.
- 1.2. To inform the identification of proposed site allocations, including CLV012 & CLV018, the Council undertook a proportionate and robust three-stage site assessment process.

- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix R (SD006.19) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study

- (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Wem Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 18 sites were considered at Clive. Within Stage 3 of the site assessment process, around 11 sites were considered at Clive.
- 1.11. Initially the Council proposed an alternative site for allocation and was the subject of Regulation 18 Plan-Making consultation (EV005.01). Responses to this consultation raised concerns have been raised about the sites proximity to services within the villages, taking into account the slightly uphill gradient from west to east, as well as concern that traffic will need to go through the village to access the A49.
- 1.12. Following due consideration of responses to this consultation, other relevant information and undertaking an updated site assessment process, CLV012 & CLV018 was identified as the proposed allocation.
- 1.13. This site and proposed site guidelines were then subject to and informed by Regulation 18 Plan-Making consultations (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and CLV012 & CLV018 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. CLV012 & CLV018 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.15. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of CLV012 & CLV018 as a proposed allocation. These objections are summarised in SD014.01 and GC4o.

1.16. They included:

- a. There is insufficient justification of why CLV012 & CLV018 was proposed for allocation over other sites. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of CLV012 & CLV018 as a proposed allocation.
- b. Distance to key services (railway station and village shop) means development of the site is unsustainable. Shropshire Council considers that the site assessment process gave appropriate consideration to the characteristics of the settlement, infrastructure constraints and opportunities, and the ability to achieve sustainable development of the site. The site assessment summaries unambiguously document the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of CLV012 & CLV018 as a proposed allocation.
- c. Ability to deliver infrastructure benefits. Shropshire Council considers that the site assessment process gave appropriate consideration to infrastructure constraints and opportunities. The site assessment summaries unambiguously document the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of CLV012 & CLV018 as a proposed allocation.

1.17. In conclusion, Shropshire Council considers that CLV012 & CLV018 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

**Question 2.** *What is the scale and type/mix of uses proposed?*

**Shropshire Council Response:**

- 2.1. CLV012 & CLV018 is proposed to be allocated for residential development. This site is some 2.17ha in size and the approximate site provision figure is some 20 dwellings.
- 2.2. Detailed development guidelines within Schedule S17.2(i) of draft Policy S17.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

**Question 3.** *What is the basis for this and is it justified?*

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S17.2(i) of draft Policy S17.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CLV012 & CLV018.
- 3.2. Initially the Council proposed an alternative site for allocation and was the subject of Regulation 18 Plan-Making consultation (EV005.01). Responses to this consultation raised concerns have been raised about the sites proximity to services within the villages, taking into account the slightly uphill gradient from west to east, as well as concern that traffic will need to go through the village to access the A49.
- 3.3. Following due consideration of responses to this consultation, other relevant information and undertaking an updated site assessment process, CLV012 & CLV018 was identified as the proposed allocation.
- 3.4. This site and proposed site guidelines were then subject to and informed by Regulation 18 Plan-Making consultations (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and CLV012 & CLV018 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 3.5. CLV012 & CLV018 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 3.6. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Question 4.** *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

**Shropshire Council Response:**

- 4.1. No planning application has yet been received on the site.

**Question 5.** *What are the benefits that the proposed development would bring?*

**Shropshire Council Response:**

- 5.1. CLV012 & CLV018 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of CLV012 & CLV018 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Clive and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Provision of additional car parking and cycle storage facilities to reduce the level of on-street parking.
  - b. Enhanced pedestrian linkages between the site and the existing facilities on the High Street and with Clive Primary School along Holly Close.
  - c. Ability to provide green infrastructure and open space – including existing trees, hedgerows and priority habitats.
- 5.5. More generally, it is also considered that development of CLV012 & CLV018 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

**Question 6.** *What are the potential adverse impacts of developing the site? How could they be mitigated?*

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing CLV012 & CLV018 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is

provided within the response to Question 1 regarding proposed allocation CLV012 & CLV018.

- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CLV012 & CLV018 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for CLV012 & CLV018 within Schedule S17.2(i) of draft Policy S17.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to entirety of the land around Clive. This has been appropriately considered within the site assessment.
  - b. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on Sweatmere and Crose Mere and Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S17.2.
  - c. There is a tree subject to a Tree Protection Order (TPO) on the northern boundary of the site and scattered trees and hedgerows present on the site. Site guidelines require existing trees, hedgerows and priority habitats to be retained and enhanced.
  - d. Noise from High Street. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to appropriately manage noise from this source.
  - e. The site may contain contaminated land. Draft Policy DP18 specifically addresses this matter.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment

(EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.

- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CLV012 & CLV018.
- 7.4. With specific regard to flood risk at CLV012 & CLV018, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, the site is not located within an identified surface flood risk zone.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including CLV012 & CLV018. It concluded that the site CLV012 & CLV018 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

**Question 8.** *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of CLV012 & CLV018 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CLV012 & CLV018.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CLV012 &



CLV018 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.

- 8.3. The draft site guidelines for CLV012 & CLV018 within Schedule S17.2(i) of draft Policy S17.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing an appropriate access onto the High Street from the site.
  - b. Providing necessary improvements to the highway network.
  - c. Providing of additional car parking and cycle storage facilities to reduce the level of on-street parking.
  - d. Enhancing pedestrian linkages between the site and the existing facilities on the High Street and with Clive Primary School along Holly Close.
  - e. Providing green infrastructure and open space – including existing trees, hedgerows and priority habitats.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of CLV012 & CLV018. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.

- 8.9. Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

**Question 9.** *Is the site realistically viable and deliverable?*

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site CLV012 & CLV018 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence appended to EV113, the site promoter stated, *"We can confirm that development of CLV012 / CLV018 is viable and deliverable, having regard to the policy requirements identified within the Pre-Submission Draft of the Shropshire Local Plan."*

**Question 10.** *What is the expected timescale and rate of development and is this realistic?*

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation CLV012 & CLV018 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2029/30. The Council also anticipates that development will progress at a rate of 10 dwellings per annum, reflecting the size of the site.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

10.4. Shropshire Council would note that within correspondence appended to the Viability Topic Paper (EV113), the site promoter stated, "*We can confirm that development of CLV012 / CLV018 is viable and deliverable, having regard to the policy requirements identified within the Pre-Submission Draft of the Shropshire Local Plan.*"

**Question 11.** *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

**Shropshire Council Response:**

11.1. Shropshire Council considers the boundary for proposed allocation CLV012 & CLV018 is entirely appropriate and there is no justification for its amendment.

11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CLV012 & CLV018.

11.3. The boundary for CLV012 & CLV018 is defined by the High Street to the north, a residential curtilage to the west, a residential property curtilage and agricultural field boundary to the east, and the extent of the proposed allocation to the south.

**Question 12.** *Are the detailed policy requirements effective, justified and consistent with national policy?*

**Shropshire Council Response:**

12.1. Yes. Shropshire Council considers the proposed site guidelines for CLV012 & CLV018 within Schedule S17.2(i) of draft Policy S17.2 are effective, justified and consistent with national policy.

12.2. These guidelines address the key requirements and considerations for the development of CLV012 & CLV018; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.

12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CLV012 & CLV018.

12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure

Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of CLV012 & CLV018 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of CLV012 & CLV018.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on CLV012 & CLV018, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included significant objections to the specific site guidelines proposed for CLV012 & CLV018. These are summarised in SD014.01 and GC4o.

## **Questions: Site Allocation HDL006 – Land south of Wedgefields Close, Hadnall**

**Question 1.** *What is the background to the site allocation? How was it identified and which options were considered?*

### **Shropshire Council Response:**

- 1.1. This proposed allocation lies to the south of Hadnall. It consists of an agricultural field. It is bounded by residential property curtilages to the north, Shrewsbury Road to the west, an agricultural field boundary to the east, and an agricultural field boundary and property curtilages to the south.
- 1.2. To inform the identification of proposed site allocations, including HDL006, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix R (SD006.19) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability:* Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.

- c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Wem Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 16 sites were considered at Hadnall. Within Stage 3 of the site assessment process, around 15 sites were considered at Hadnall.
- 1.11. HDL006 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and HDL006 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and proposed allocation HDL006. These objections are summarised in SD014.01 and GC4o. They included:
- a. The conclusions of Stage 2a of the site assessment process do not support the identification of HDL006 as a proposed allocation: Shropshire Council considers the conclusions of Stage 2a of the site assessment process were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.
  - b. There is insufficient justification of why HDL006 was proposed for allocation over other sites: Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of HDL006 as a proposed allocation.
  - c. Concerned about the ability to provide a safe access to the site. Shropshire Council considers that the site assessment process gave appropriate consideration to highway matters, informed by analysis undertaken by Highways Officers. The site assessment summaries unambiguously document the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of HDL006 as a proposed allocation.
  - d. Concerned about flood risk on the site/resulting from development of the site. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of flood risk informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39). The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of HDL006 as a proposed allocation.
- 1.14. In conclusion, Shropshire Council considers that HDL006 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

**Question 2.** *What is the scale and type/mix of uses proposed?*

**Shropshire Council Response:**

- 2.1. HDL006 is proposed to be allocated for residential development. This site is some 1.71ha in size and the approximate site provision figure is some 40 dwellings.
- 2.2. Detailed development guidelines within Schedule S17.2(i) of draft Policy S17.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

**Question 3.** *What is the basis for this and is it justified?*

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S17.2(i) of draft Policy S17.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HDL006.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Question 4.** *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

**Shropshire Council Response:**

- 4.1. No planning application has yet been received on the site.



**Question 5.** *What are the benefits that the proposed development would bring?*

**Shropshire Council Response:**

- 5.1. HDL006 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of HDL006 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Hadnall and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Land for additional car parking for the school.
  - b. Extension of the 30mph speed limit for the village.
  - c. Extension of the A49 pedestrian footway along the sites road frontage.
- 5.5. More generally, it is also considered that development of HDL006 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

**Question 6.** *What are the potential adverse impacts of developing the site? How could they be mitigated?*

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing HDL006 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HDL006.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HDL006 constituted an appropriate proposed residential allocation; it was

possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.

- 6.3. The draft site guidelines for HDL006 within Schedule S17.2(i) of draft Policy S17.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to entirety of the land around Clive. This has been appropriately considered within the site assessment.
  - b. A small component of the site is located within the surface water flood risk zone and within proximity of an historic flood event. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - c. Habitats Regulations Assessment (HRA) potentially required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S17.2.
  - d. There are mature trees and hedgerows present on the site. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - e. Noise associated with the adjoining road. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to appropriately manage noise from Shrewsbury Road.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.

- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HDL006.
- 7.4. With specific regard to flood risk at HDL006, in summary:
- a. With regard to fluvial flood risk, the proposed allocation is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 1% of the proposed allocation is located within the 100 year surface flood risk zone and around 12% of the proposed allocation is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for HDL006 within Schedule S17.2(i) of draft Policy S17.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including HDL006. It concluded that the site HDL006 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

**Question 8.** *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of HDL006 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HDL006.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HDL006 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for HDL006 within Schedule S17.2(i) of draft Policy S17.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing land for additional car parking for the school.
  - b. Extending the 30mph speed limit for the village.
  - c. Extending the A49 pedestrian footway along the sites road frontage.
  - d. Providing necessary improvements to the local and strategic road network.
  - e. Providing green infrastructure and open space.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of HDL006. This includes ensuring the delivery of the

infrastructure necessary to support the development and appropriate management of any site constraints.

- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.9. Other draft policies of particular relevance include:
  - a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

**Question 9.** *Is the site realistically viable and deliverable?*

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site HDL006 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within their Regulation 19 consultation response (reference A0454), the promoter of the site stated, *"We represent a proposed allocated site and therefore we would be pleased to have the opportunity to answer any questions the Inspector may have and to demonstrate that the site is available and deliverable."*

**Question 10.** *What is the expected timescale and rate of development and is this realistic?*

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation HDL006 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2027/28 and continue until 2028/29. The Council also anticipates that development will progress at a rate of 10 dwellings per annum, reflecting the size of the site.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that within their Regulation 19 consultation response (reference A0454), the promoter of the site stated, *"We represent a proposed allocated site and therefore we would be pleased to have the opportunity to answer any questions the Inspector may have and to demonstrate that the site is available and deliverable."*

**Question 11.** *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation HDL006 is entirely appropriate and there is no justification for its amendment.
- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HDL006.
- 11.3. The boundary for HDL006 is defined by residential property curtilages to the north, Shrewsbury Road to the west, an agricultural field boundary to the east, and an agricultural field boundary and property curtilages to the south.

**Question 12.** *Are the detailed policy requirements effective, justified and consistent with national policy?*

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for HDL006 within Schedule S17.2(i) of draft Policy S17.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of HDL006; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HDL006.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of HDL006 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of HDL006.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on HDL006, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
- c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
- d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
- e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included significant objections to the specific site guidelines proposed for HDL006. These are summarised in SD014.01 and GC4o.

### **Questions: Site Allocation SHA019 – Land between the A53 and Poynton Road, Shawbury**

**Question 1.** *What is the background to the site allocation? How was it identified and which options were considered?*

#### **Shropshire Council Response:**

- 1.1. This proposed allocation is an irregularly shaped site to the south of the village of Shawbury. It consists of the entirety of one agricultural field and components of two other agricultural fields. It is bounded by residential curtilages to the north-east, the extent of an adjoining development site to the north-west, Poynton Road to the east, a wooded area and agricultural field boundaries to the south, and a wooded area and the extent of the proposed allocation to the west.
- 1.2. To inform the identification of proposed site allocations, including SHA019, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is



summarised within Appendix R (SD006.19) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).

- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.

- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Wem Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 17 sites were considered at Shawbury. Within Stage 3 of the site assessment process, around 10 sites were considered at Shawbury.
- 1.11. SHA019 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHA019 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process and identification of SHA019 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
  - a. There are constraints present (reference to flood risk, sewerage capacity, ecology and public right of way) which mean it is unsuitable for development. Shropshire Council considers that this proposed allocation was informed by a proportionate and robust site assessment process, which gave appropriate consideration to potential constraints and opportunities. The site assessment summaries unambiguously document the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of SHA019 as a proposed allocation.
- 1.14. In conclusion, Shropshire Council considers that SHA019 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

**Question 2.** *What is the scale and type/mix of uses proposed?*

**Shropshire Council Response:**

- 2.1. SHA019 is proposed to be allocated for residential development. This site is some 5.25ha in size and the approximate site provision figure is some 80 dwellings.
- 2.2. Detailed development guidelines within Schedule S17.2(i) of draft Policy S17.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

**Question 3.** *What is the basis for this and is it justified?*

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S17.2(i) of draft Policy S17.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHA019.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Question 4.** *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

**Shropshire Council Response:**

- 4.1. No planning application has yet been received on the site.

**Question 5.** *What are the benefits that the proposed development would bring?*

**Shropshire Council Response:**

- 5.1. SHA019 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of SHA019 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Shawbury and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Provision of a pedestrian footway along the sites eastern boundary connecting to the existing footway on Poynton Road.
  - b. Delivery of a footpath link, alongside appropriate infrastructure including lighting and secure fencing, to support enhanced connectivity to St Marys Primary School and to ease congestion on Poynton Road.
  - c. Ability to provide green infrastructure and open space – including existing trees, hedgerows and priority habitats.
  - d. Contributions to the consolidation, conservation and interpretation of the Grade II listed brick kiln and associated structures west of the site.
- 5.5. More generally, it is also considered that development of SHA019 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

**Question 6.** *What are the potential adverse impacts of developing the site? How could they be mitigated?*

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing SHA019 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHA019.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that Sha019 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for SHA019 within Schedule S17.2(i) of draft Policy S17.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to entirety of the land around Clive. This has been appropriately considered within the site assessment.
  - b. A component of the site is located within the surface water flood risk zone and within proximity of an historic flood event. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - c. Habitats Regulations Assessment (HRA) potentially required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S17.2.
  - d. The site contains part of an environmental network and there are scattered trees and hedgerows present. As such, site guidelines require retention and enhancement of existing trees, hedgerows and priority habitats. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - e. Noise, dust and odour associated with nearby commercial activities. Site guidelines require acoustic design, layout, green

infrastructure and appropriate building materials to appropriately manage noise and associated dust and odour.

- f. Site includes part of the site of the former Shawbury brick and tile works (HER PRN 28267) and adjacent to the line of the Roman road from Wroxeter to Whitchurch (and Chester) (HER PRN 00066). Site guidelines require development to reflect and respect the sites heritage and heritage assets within the wider area. They also require contributions towards the consolidation, conservation and interpretation of the Grade II listed brick kiln and associated structures west of the site.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHA019.
- 7.4. With specific regard to flood risk at SHA019, in summary:
  - a. With regard to fluvial flood risk, the proposed allocation is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 2% of the proposed allocation is located within the 30 year surface flood risk zone; around 4% of the proposed allocation is located within the 100 year surface flood risk zone; and around 13% of the proposed allocation is located within the 1,000 year surface flood risk zone. Around 9% of the site is in 20m of a detailed river network.
- 7.5. The proposed site guidelines for SHA019 within Schedule S17.2(i) of draft Policy S17.2 address this issue, stating "*The site will*

*incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.”*

- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including SHA019. It concluded that the site SHA019 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which ‘trigger’ the need to undertake site specific Sequential and Exception Test Assessments.

**Question 8.** *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of SHA019 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHA019.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHA019 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for SHA019 within Schedule S17.2(i) of draft Policy S17.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and

Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site off the new roundabout onto the A53 (via adjoining development).
  - b. Providing necessary improvements to the road network.
  - c. Provision of a pedestrian footway along the sites eastern boundary connecting to the existing footway on Poynton Road.
  - d. Delivery of a footpath link, alongside appropriate infrastructure including lighting and secure fencing, to support enhanced connectivity to St Marys Primary School and to ease congestion on Poynton Road.
  - e. Ability to provide green infrastructure and open space – including existing trees, hedgerows and priority habitats.
  - f. Contributions to the consolidation, conservation and interpretation of the Grade II listed brick kiln and associated structures west of the site.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHA019. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.9. Other draft policies of particular relevance include:
  - a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.



- d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

**Question 9.** *Is the site realistically viable and deliverable?*

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site SHA019 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence appended to EV113 the site promoter stated, "The site is viable and capable of coming forward as part of the Local Plan Review process."

**Question 10.** *What is the expected timescale and rate of development and is this realistic?*

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation SHA019 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2029/30. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

**Question 11.** *Is the boundary of the site appropriate? Is there any justification for amending the boundary?*

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation SHA019 is entirely appropriate and there is no justification for its amendment.

- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHA019.
- 11.3. The boundary for SHA019 is defined by residential curtilages to the north-east, the extent of an adjoining development site to the north-west, Poynton Road to the east, a wooded area and agricultural field boundaries to the south, and a wooded area and the extent of the proposed allocation to the west.

**Question 12.** *Are the detailed policy requirements effective, justified and consistent with national policy?*

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for SHA019 within Schedule S17.2(i) of draft Policy S17.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SHA019; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHA019.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of SHA019 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local

Plan. They are also considered to be deliverable through the development of SHA019.

- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on SHA019, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included significant objections to the specific site guidelines proposed for SHA019. These are summarised in SD014.01 and GC4o.