

Shropshire Local Plan Examination

Shropshire Council Response to:

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

Matter 18



Matter 18 - Minsterley and Pontesbury Place Plan Area (policy S12)

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 Minsterley and Pontesbury Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Minsterley and Pontesbury Place Plan area is established within draft settlement policies S12.1-S12.3, 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; but crucially are also responsive to the characteristics, constraints, and opportunities of the various settlements in the Place Plan area.
- 1.4. This includes the fact that the south eastern part of the Minsterley Pontesbury Place Plan incorporates part of Shropshire Hills National Landscape with the boundary reaching the southern edge of Pontesbury village.
- 1.5. The Minsterley and Pontesbury Place Plan is unique amongst the Place Plan areas in Shropshire in that it does not contain a Strategic, Principal or Key Centre. However, the two main settlements within the Place Plan area, Minsterley and Pontesbury, are large villages in proximity of each other with a range of services and facilities available to serve the rural hinterland. Thus, the draft Shropshire Local Plan identifies these settlements as specific locations to accommodate development.
- 1.6. Specifically, Minsterley and Pontesbury, as significant rural service areas, are proposed to be identified as Community Hubs and receive an appropriate scale and type of development, in line with draft Policy SP8. This is intended to support and sustain their Community

Hub function, including providing employment, services and facilities to serve the needs of the broader Place Plan area.

- 1.7. The settlements will provide a focus for development within the rural area in the central part of Shropshire with residential development responding to local needs and contributing towards achieving the housing guideline for the rural area of Shropshire. This is consistent with the requirements of SP2 (and associated policies in the draft Shropshire Local Plan) which provide for appropriate development in rural areas to complement that taking place in urban areas, thereby supporting the long term sustainability of rural communities.
- 1.8. Proposed development guidelines for Minsterley and Pontesbury Community Hubs envisage the delivery of around 155 and 175 dwellings respectively between 2016 and 2038. Consistent with other proposed Community Hubs, there are no specific employment guidelines proposed for Minsterley and Pontesbury in the draft Shropshire Local Plan - but the draft settlement policy S12.1 with its supporting text does acknowledge the employment element of the saved SAMDev allocation at Hall Farm Minsterley (MIN002), the importance of the existing large employment area in Minsterley (which it is proposed to continue to protect), and the potential for policy compliant small-scale employment development.
- 1.9. A Neighbourhood Plan for Pontesbury was 'made' in December 2023, which supports the delivery of the proposed emerging strategy for the village and aligns with the wider strategy, policies and timescales of the draft Shropshire Local Plan. This is recognised within draft Policy S12.1, which requires development to be consistent with relevant policies of any adopted Neighbourhood Plan.
- 1.10. The Pontesbury Neighbourhood Plan does not allocate sites for development and expects that development will be delivered through the saved SAMDev allocations, proposed draft Shropshire Local Plan site allocations, and appropriate small-scale windfall development - as set out within draft Policies S12.1-S12.3.
- 1.11. In identifying site allocations to contribute to the achievement of the strategies proposed for Minsterley and Pontesbury, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
- 1.12. Through this process proposed residential site allocations were identified at: Minsterley (MIN018) and Pontesbury (PON008, PON017 & PON030). This assessment work is summarised within

Appendix I (SD006.14) of the of Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).

- 1.13. No other Community Hubs or Community Clusters are identified in the Minsterley and Pontesbury Place Plan area.
- 1.14. The Minsterley and Pontesbury 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 Minsterley and Pontesbury Place Plan area was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.15. 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.
- 1.16. 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. 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.
 - d. Conclusions of infrastructure planning processes (most recent publication is GC54).
- 1.17. 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.
- 1.18. 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 maintenance and 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, including the presence of the Shropshire Hills National Landscape within the Place Plan area, and the challenge of climate change, consistent with Chapter's 14-16 of the NPPF.

Questions: Site Allocation MIN018 – Land west of A488, Minsterley

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 a 1.05ha L shaped site which lies to the northern entrance of the village of Minsterley. It consists of an agricultural field adjoining a small, relatively recently built residential development to the south with the A488 running along the frontage of the site.
- 1.2. To inform the identification of proposed site allocations, including MIN018, 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 Minsterley and Pontesbury 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 Minsterley and around 39 were considered at Pontesbury. Within Stage 3 of the site assessment process,

around 4 sites were considered at Minsterley and around 19 were considered at Pontesbury.

- 1.11. MIN018 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 MIN018 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 MIN018. These objections included:
 - a. That the housing guideline for MIN018 is too low, particularly when compared to the adjoining site, and should be increased: Shropshire Council considers the proposed capacity of MIN018 is appropriate, reflecting the site assessment process and the application of a precautionary approach to site capacity, but recognising that the specific number of dwellings that is appropriate on any allocated site will be determined at the Planning Application stage.
 - b. Questioning the justification for the allocation given that MIN018 has greater highway implications than alternative sites: Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken, including the consideration of highways issues which has been informed by feedback from the Council's Highway Officers, and explains the conclusions reached. This site assessment process fully justifies the identification of MIN018 as a proposed allocation.
 - c. That the alternative promoted sites should be brought forward for development: 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 MIN018 as a proposed allocation.
- 1.14. In conclusion, Shropshire Council considers that MIN018 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. MIN018 is proposed to be allocated for residential development. This site is some 1.05ha in size and the approximate site provision figure is around 20 dwellings.
- 2.2. Detailed development guidelines within Schedule S12.1(i) of draft Policy S12.1 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 S12.1(i) of draft Policy S12.1 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 MIN018.
- 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. MIN018 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 MIN018 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 Minsterley and Shropshire.
- 5.3. The site is well related to the built form of the settlement of Minsterley and the site's scale, 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. The introduction of an extended 30 mph zone and other potential traffic calming measures on the A488 at the entrance to the village.
 - b. Provision for improved non-vehicular access to services and facilities by providing for footway extension and linkage via a crossing to the existing footpath/cycleway along the A488 towards Pontesbury.
 - c. Ability to provide green infrastructure– including a buffer to the environmental network and retention of mature trees on site 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 MIN018 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 MIN018 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 MIN018.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that MIN018 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 MIN018 within Schedule S12.1(i) of draft Policy S12.1 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. The ditch at the western boundary of the site forms an environmental network corridor and there are significant trees and hedgerows present. As such, site guidelines require detailed consideration of trees, hedgerows and ecological interest in relation to development proposals, that the environmental network to western boundary is buffered and mature trees on the site are retained. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - b. Noise associated with the adjoining road. Site guidelines require that the design and layout should minimise noise impact from adjacent road. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
 - c. Part of the site is subject to flood constraints with a relatively small part of the site located within Flood Zone 2/3 and surface water flood risk zone. It was anticipated in considering the proposed allocation that known pluvial flood risk would reduce the development capacity of the site and this is reflected in the guideline dwelling provision figure. Site guidelines seek exclusion of development from areas of the site affected by flooding and require appropriate sustainable drainage and that a flood risk and drainage assessment FRA should inform any development scheme. Furthermore, site guidelines stipulate that any flood risk

areas will form part of the Green Infrastructure network. The requirement for the submission of flood risk and drainage reports would inform any future planning application.

- d. It has been identified by a consultee that the site is adjacent to springs/surface water courses, therefore groundwater is likely to be shallow so foundation dewatering and surface water management aspects will need consideration. This is addressed by draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in this circumstance.
- e. The western part of the site is located within a mineral safeguarding area (MSA), as is other land to the northern and western side of Minsterley village and beyond. Draft Policy DP29 addresses mineral safeguarding and establishes expectations for development in MSAs.
- f. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Minsterley. This has been appropriately considered within the site assessment.
- g. The site, as would any in Minsterley or Pontesbury, falls within the area of where development has potential to impact the Stiperstones & The Hollies SAC through increased recreational pressures. The Draft Place Plan area policy S12.1(6) (supported by Draft Local Plan Policies DP12, DP14 and DP15) recognises this and provides that mitigation measures will be required to remove any such adverse effect arising from development. Mitigation measures for recreational impacts are identified in the Draft Local Plan Habitats Regulation Assessment (HRA) and supporting documents and includes measures to increase accessibility to local open space where needed. 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.
- h. The site is within an area of medium/medium-low landscape sensitivity and medium-low visual 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.

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 MIN018.
- 7.4. With specific regard to flood risk at MIN018, in summary:
 - a. With regard to fluvial flood risk, 6% of the proposed allocation site MIN018 is located within Flood Zone 2, the remainder is within Flood Zone 1, the area with the lowest risk of flooding. Flood Zone 2 encroaches onto the northwest corner of the site; this flooding is associated with the Minsterley Brook which lies to the northwest of the site. There is also an unmodelled watercourse which is not covered by Flood Zone mapping running along the site's western boundary.
 - b. With regard to other sources of flood risk, less than 1% of proposed allocation MIN018 is located within the 30 year surface flood risk zones, around 3% is located within the 100 year surface flood risk zones and around 20% of proposed allocation MIN018 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for MIN018 within Schedule S12.1(i) of draft Policy S1.12 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, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas 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 MIN018. It concluded that the site MIN018 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 MIN018 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 MIN018.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that MIN018 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 MIN018 within Schedule S12.1(i) of draft Policy S12.1 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.
 - b. Extension of the 30mph zone and other potential traffic calming measures on the A488.
 - c. Provision for improved non-vehicular access to services and facilities by providing for footway extension and linkage via a

crossing to the existing footpath/cycleway on the opposite side of the A488.

- d. Ability to provide green infrastructure– including a buffer to the environmental network and retention of mature trees on site in association with exclusion of development from areas subject to flood risk and a sustainable drainage and flood water management strategy.
 - e. Provision for improved non-vehicular access to services and facilities by providing for footway extension and linkage via a crossing to the existing footpath/cycleway along the A488 towards Pontesbury.
 - f. Providing a buffer to the environmental network at the western boundary.
 - g. Retention of trees and hedgerows on the site.
 - h. Exclusion of development from areas subject to flood risk and a sustainable drainage and water management strategy with the incorporation of 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 MIN018. 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 MIN018 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).

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 MIN018 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 all 20 dwellings on the site will take place in 2027/28, a rate of development consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers this expected timescales and delivery rate is 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 MIN018 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 MIN018.

11.3. The front south eastern boundary for MIN018 is defined by the A488 with a hedgerow to the frontage and the field boundaries to the north east and north west. As previously referenced, there are also watercourses to the north western boundary. The site adjoins existing residential development to its southern side and would form an extension to the existing built up area of the village.

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 MIN018 within Schedule S12.1(i) of draft Policy S12.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of MIN018; 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 MIN018.
- 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 MIN018 – 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 MIN018.
- 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 MIN018, 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 MIN018.
- 12.9. Namely that the site housing guideline is too low and should be increased to 30 (also that the guideline for Minsterley Community Hub correspondingly increased to 185).
- 12.10. Shropshire Council identifies within paragraph 4 of draft Policy S12.1 that site provision figures are approximate but considers that at this stage are appropriate. The draft site guidelines for MIN018 within Schedule S12.1(i) of draft Policy S12.1 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, in particular in respect of flood risk and water management.

Questions: Site Allocation PON008 & PON017 & PON030 – Land at Minsterley Road, Pontesbury

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 PON008 & PON017 & PON030 lies to the north-western edge of Pontesbury. It consisted of one larger agricultural field (PON008) and two smaller parcels of land, one a small field (PON030) and the other (PON017) containing a residential property (known as The Ozarks) and its curtilage.
- 1.2. The site has frontage to and is bounded by Minsterley Road (A488) to the south with mixed residential development across the road to the south. To the west the site is contained by a treed boundary with the area containing large depot/storage type buildings associated with an adjoining removals /storage business. Surrounding land to the north of the site is agricultural and there are also dwellings to the East.
- 1.3. PON008, the largest parcel, contains the shared access for the allocation and the adjoining parcels PON017 and PON030 are currently served by a private track which also provides access to existing residential properties.
- 1.4. To inform the identification of proposed site allocations, including PON008 & PON017 & PON030, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.5. 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).
- 1.6. 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).
- 1.7. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.8. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a site's 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.
- 1.9. 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.
- 1.10. 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.
- 1.11. 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 Minsterley and Pontesbury 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.
- 1.12. Within Stages 2a and 2b of the site assessment process, around 16 sites were considered at Minsterley and around 39 were considered at Pontesbury. Within Stage 3 of the site assessment process,

around 4 sites were considered at Minsterley and around 19 were considered at Pontesbury.

- 1.13. PON008, PON017 and PON030 were promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.14. 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 PON008 & PON017 & PON030 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment and allocation process.
- 1.16. These objections sought that alternative promoted sites (PON001 and PON040) should also be brought forward for development: Shropshire Council considers that the proposed development strategy for Pontesbury, including existing commitments, windfall allowances and proposed allocations is sustainable, effective and deliverable. The site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of PON008 & PON017 & PON030 as a proposed allocation.
- 1.17. In conclusion, Shropshire Council considers that PON008 & PON017 & PON030 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. PON008 & PON017 & PON030 is proposed to be allocated for residential development. This site is some 2.61ha in size and the approximate site provision figure is around 40 dwellings.
- 2.2. Since the publication of the Council's assessment of housing land supply (GC47) the largest part of the site PON008 has been built out following the grant of planning permissions (21/03660/FUL and 22/03150/AMP) for 38 dwellings. The approved scheme incorporated the new roundabout and the site layout incorporated

potential access points to the adjoining land comprising the remainder of the allocation.

- 2.3. Detailed development guidelines within Schedule S12.1(i) of draft Policy S12.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for development of the site.
- 2.4. The specific residential development mix of the remainder of the site would also 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 S12.1(i) of draft Policy S12.1 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 PON008 & PON017 & PON030.
- 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.
- 3.4. The largest part of the site PON008 has been granted planning permission and been built out with 38 dwellings served with a new roundabout access. GC47 acknowledges the grant of planning permission and that subsequently development had started on site, identifying a further 2 dwellings to be delivered on the remaining smaller elements of the site allocation. The site layout incorporated estate roads configured to provide potential access points to the adjoining land comprising the remainder of the allocation. It is anticipated that the other elements of the site PON017 and PON030 will follow as subsequent phases of development with a withdrawn application on PON030 demonstrating developer interest in that site.

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. A significant component of the site (aligning with the extent of PON008) benefits from planning permission 21/03660/FUL (and 22/03150/AMP being an amendment to 21/03660/FUL) for 38 dwellings and development, including roundabout access, is largely complete.
- 4.2. Shropshire Council considers that this development has delivered the main components of this proposed allocation, including achieving many of the site guidelines, and facilitates development of the remainder of the site – including through delivery of the shared access which is required by site guidelines. It is considered that the remainder of the site, aligning with the extent of PON017 and PON030 will follow as subsequent phases of development with a withdrawn application on PON030 (22/05722/FUL) demonstrating developer interest in that site.

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

Shropshire Council Response:

- 5.1. PON008, PON017 and PON030 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 PON008, PON017 and PON030 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 Minsterley and Shropshire.
- 5.3. The site is well related to the built form of the settlement of Pontesbury and the site's 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.

- 5.5. These include:
- a. The introduction of new roundabout junction also serving existing residential development in Pontesbury.
 - b. Provision for improved non-vehicular access to services, facilities and recreational areas by providing a footway along the site's frontage to link to existing on the north side of the A488.
 - c. 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.
 - d. Potential enhancement of the environmental network with additional planting as well as the retention of mature trees and hedgerows.
- 5.6. More generally, it is also considered that development of PON008, PON017 and PON030 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 PON008, PON017 and PON030 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 PON008, PON017 and PON030.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PON008, PON017 and PON030 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 PON008, PON017 and PON030 within Schedule S12.1(i) of draft Policy S12.1 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 and the western boundary of the site PON008 forms an environmental network corridor and is subject to a TPO. PON017, which includes a

dwelling and its curtilage, has mature trees and hedgerows and ecological interest and PON030 also has potential ecological interest and requires detailed survey. As such, site guidelines require detailed consideration of trees, hedgerows and ecological interest in relation to development proposals, that the environmental network to western boundary is taken into account and mature trees on the site are retained. Additionally, the area of flood risk is understood to be adjacent to sensitive wooded area adjoining site and was identified as providing opportunities to buffer impact and enhance environmental network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

- b. The site PON008, PON017 and PON030 has elevated/ rising topography and is within an area of medium landscape sensitivity and medium to low visual sensitivity for housing. This has been appropriately considered within the site assessment and site guidelines recognise the need to take this into account in site design.
- c. Noise associated with the adjoining A488 road. Site guidelines require that the design and layout should minimise noise impact from adjacent road. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- d. Part of the site is subject to flood constraints. Considering each constituent part of the site: PON008, PON017 and PON030 PON0017 and PON030 are in flood zone 1 but PON008 is subject to surface water flood risk zone as detailed below. It was anticipated in considering the proposed allocation that design, landscaping, layout of and access to the development would need to take into account all sources of flood risk as informed by a flood risk assessment, and this is reflected in the guideline dwelling provision figure. Site guidelines seek exclusion of development from areas of the site affected by residual flood risk, implementation of appropriate sustainable drainage informed by a flood risk and drainage assessment. Furthermore, site guidelines stipulate that any flood risk areas will form part of the Green Infrastructure network. The requirement for the submission of flood risk and drainage reports would inform any future planning application.
- e. Within site PON008, PON017 and PON030 contaminated land likely to be found due to past land use and historic contamination but remediation is considered to be likely to be available and site guidelines require that relevant supporting studies should be undertaken, and their recommendations implemented.
- f. The whole of the site PON008, PON017 and PON030 is located within a mineral safeguarding area (MSA), as is the whole of

Pontesbury village. Draft Policy DP29 addresses mineral safeguarding and establishes expectations for development in MSAs.

- g. The site PON008, PON017 and PON030 consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Pontesbury. This has been appropriately considered within the site assessment.
- h. The site, as would any in Minsterley or Pontesbury, falls within the area of where development has potential to impact the Stiperstones & The Hollies SAC through increased recreational pressures. The Draft Place Plan area policy S12.1(6) (supported by Draft Local Plan Policies DP12, DP14 and DP15) recognises this and provides that mitigation measures will be required to remove any such adverse effect arising from development. Mitigation measures for recreational impacts are identified in the Draft Local Plan Habitats Regulation Assessment (HRA) and supporting documents and includes measures to increase accessibility to local open space where needed. 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.

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 PON008 & PON017 & PON030.

- 7.4. With specific regard to flood risk at PON008 & PON017 & PON030, in summary:
- a. With regard to fluvial flood risk, proposed allocation PON008 & PON017 & PON030 is located entirely within Flood Zone 1, the area with the lowest risk of flooding. There is a small unnamed watercourse close to the site, but it is deemed unlikely by the SFRA that this would impact the site.
 - b. With regard to other sources of flood risk, the part of the site identified as PON008 is subject to surface water flood risk. Around 10% of PON008 is located within the 30 year surface flood risk and 15% in the 100 year surface flood risk zones respectively, with around 41% of PON008 located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for PON008 & PON017 & PON030 within Schedule S12.1(i) of draft Policy S1.12 address this issue, requiring a site flood risk assessment and 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 PON008 & PON017 & PON030. It concluded that the site PON008 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 PON008 & PON017 & PON030 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 PON008 & PON017 & PON030.

- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PON008 & PON017 & PON030 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 PON008 & PON017 & PON030 within Schedule S12.1(i) of draft Policy S12.1 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 appropriate shared access arrangements to serve the whole site.
 - b. A potential new roundabout junction serving the development and Ashford Drive linkage via a crossing to the existing footpath/cycleway on the opposite side of the A488.
 - c. Design, landscaping, layout of and access to the development to take into account: elevated and rising topography; protected and mature trees and hedgerows, including local ancient woodland; heritage and ecological interest; potential contamination, road noise considerations and all sources of flood risk.
 - d. Enhancement of green infrastructure in association with exclusion of development from areas subject to flood risk together with a sustainable drainage and flood water management strategy.
 - e. Provision for improved non-vehicular access to recreational areas, services and facilities by providing for footway extension providing linkage to the existing footpath on the Northern side of A488 towards Pontesbury.
- 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 PON008 & PON017 & PON030. 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 PON008 & PON017 & PON030 is realistically viable and deliverable with a significant component of the site (aligning with the extent of PON008) including shared roundabout access largely complete.
- 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 also note, as set out in response to Question 4, that a further component of the site, aligning with the extent PON030, has been subject to a withdrawn application

(22/05722/FUL) demonstrating developer interest in that portion of the site.

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 PON008 & PON017 & PON030 were 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. However, a significant component of the site (aligning with the extent of PON008) benefits from planning permission (21/03602/FUL) for 38 dwellings and these have been built. The forecasting within GC47 recognises this and anticipates that the remaining 2 dwellings will be completed within the rest of the site in 2025/26.
- 10.3. An appropriate site layout and shared roundabout access has been put in place to facilitate access to the whole site (PON008 & PON017 & PON030).
- 10.4. Shropshire Council considers therefore that 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 PON008 & PON017 & PON030 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 PON008 & PON017 & PON030.
- 11.3. The front southern boundary for PON008 & PON017 & PON030 is defined by the A488, to the east by a private access track and to the west the site is contained by a well-defined treed boundary with

the part of the site that has been developed following the previous field boundary to the eastern side of PON008. The remaining elements of the site have a northern boundary associated with the existing residential property The Ozarks (PON017).

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 PON008 & PON017 & PON030 within Schedule S12.1(i) of draft Policy S12.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of PON008 & PON017 & PON030; 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 PON008 & PON017 & PON030.
- 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 PON008 & PON017 & PON030 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 PON008 & PON017 & PON030.

- 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 PON008 & PON017 & PON030, 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. Representations made during the Regulation 19 Pre-Submission Consultation responses focused on the exclusion of alternative promoted sites (PON001 and PON040) with the Parish Council commenting that the proposed site allocation PON008 & PON017 & PON030 can deliver the identified dwelling guideline. These responses are summarised in SD014.01 and GC4o.