

Shropshire Local Plan Examination

Shropshire Council Response to:

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

Matter 15



Matter 15 - Highley Place Plan Area (policy S9) – see MMs 172 & 173

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 Highley Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Highley Place Plan area is established within draft settlement policies S9.1-S9.4, 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. Due to the characteristics, constraints and opportunities of the settlements in the Highley Place Plan area, the draft Shropshire Local Plan identifies only Highley itself as a specific location to accommodate development.
- 1.5. Specifically, Highley 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 east of the County, consistent with the requirements of Policy S9.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Highley envisage the delivery of around 250 dwellings and 3ha of employment land between 2016 and 2038.
- 1.6. In identifying site allocations to contribute to the achievement of the strategies proposed for Highley, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at the settlement. Through this process one proposed residential allocation (HNN016) was identified at Highley. This assessment work is summarised within Appendix 6 of GC44.

- 1.7. The Highley Place Plan area generally has a strong functional relationship to the Black Country, due to its geographic location. As a result, Highley was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.8. A robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options within the identified assessment geography – including Highley. However, due to the settlements characteristics and constraints, following assessment of all site options at the town, it was ultimately considered more suitable locations existed to accommodate proposed contributions. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 1.9. 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.
- 1.10. 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, 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 HNN016 – Land south of Oak Street, Highley

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-east of Highley. It consists of one large agricultural field and the remainder of a smaller agricultural field (the majority of which now contains an affordable housing development). This affordable housing development has created the access to this proposed site allocation.
- 1.2. The site is bounded by agricultural field boundaries and country lanes/accesses to the north and east; a road to the south, beyond which is built form; and property curtilages to the west, beyond which is built form.
- 1.3. To inform the identification of proposed site allocations, including HNN016, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. 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).
- 1.5. 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 6 of the additional Sustainability Appraisal (GC44).

- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. 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.
- 1.8. 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.
- 1.9. 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.
- 1.10. 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 Highley 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.

- 1.11. Within Stages 2a and 2b of the site assessment process, around 22 sites were considered at Highley. Within Stage 3 of the site assessment process, around 13 sites were considered at Highley.
- 1.12. HNN016 was proactively promoted for development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Initially, the proposed allocation which was subject to and informed by a Regulation 18 Plan-Making consultation (EV005.01) extended further south. However, planning permission was subsequently granted for an affordable housing development on the southern component of the site (which has now been completed and establishes the access to this proposed allocation), so it was excluded from the extent of the proposed allocation.
- 1.14. The revised extent of allocation HNN016 was subject to and informed by a Regulation 18 Plan-Making consultation (EV007.01); Regulation 19 Pre-Submission Consultation; and 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 process undertaken to identify proposed allocation HNN016. These objections are summarised in SD014.01 and GC4o. They included:
 - a. The site has a limited road frontage and proposed access is unsafe on a bend in the road. Shropshire Council would note that access to HNN016 has been established to serve the affordable housing to the south of the site. Importantly, the site assessment process undertaken to inform identification of proposed allocations was informed by assessment by Highways Officers and included specific consideration of highway matters, this process concluded an appropriate and safe access was achievable. Furthermore, the safety and suitability of the access established to the affordable housing site to the south of this proposed allocation was considered through the planning application process.
 - b. There has been a failure to adequately consider alternative sites/options. Shropshire Council considers HNN016 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations.

- c. Site assessment has been inadequate and/or not informed by technical assessments and site layouts – including consideration of proximity to the Grade II listed Hazelwell’s Farmhouse. Shropshire Council considers HNN016 was identified through a proportionate and robust site assessment process. This was informed by analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers; and 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). Specific consideration was given to the proximity to the Grade II listed Hazelwell’s Farmhouse.
- d. The size and relationship of the site to the existing built form is inappropriate. Shropshire Council considers HNN016 is proportionate in scale to the settlement of Highley and has an appropriate relationship to its built form. The site adjoins the built form of the settlement on its western and southern boundaries and is enclosed by agricultural field boundaries / country lanes/accesses to the north and east. HNN016 was identified through a proportionate and robust site assessment process which included consideration of the relationship of the site to existing built form.
- e. There is a strip of land between the site and existing dwellings, which means it is inappropriate for development. Shropshire Council considers that due consideration was given to site boundaries within the site assessment process.
- f. The site includes made-up land, which is liable to slippage and unsuitable for development. Shropshire Council recognises that due to the history of coal mining activities in the area there is a need to carefully consider ground conditions in and around the settlement. This has been undertaken through the proportionate and robust site assessment process and further consideration will occur through any future planning application process.
- g. The site will have a negative visual impact (reference to Severn Valley, Severn Valley Railway and Alveley). Landscape and visual sensitivity was considered within the proportionate and robust site assessment process, which was informed by data and conclusions from a Landscape and Visual Sensitivity Study (EV071).
- h. Views from the community have not been considered. Shropshire Council has given due consideration to all responses to the various consultations undertaken to inform the draft Shropshire Local Plan. Where objections to proposals have not led to a subsequent change, this does not mean Shropshire Council has failed to consider objectors consultation responses. Rather it is

the role of the Local Plan to balance the material considerations raised through consultation processes, against other information, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the plan-making process.

- i. Failure to consider reasons for past refusal of fences hedges and walls on the site (article 4 restrictions on the site). Article 4 restrictions relate to permitted development rights, this does not affect the suitability of a site for development.
- j. There is insufficient infrastructure capacity to support the development. Shropshire Council considers the infrastructure capacity has been appropriately considered through the proportionate and robust site assessment. This process was informed by consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
- k. There will be an unacceptable heritage impact. Shropshire Council considers that heritage impacts have been appropriately considered through the proportionate and robust site assessment. This process was informed by analysis undertaken by Heritage Officers.

1.16. In conclusion, Shropshire Council considers that HNN016 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. HNN016 is proposed to be allocated for residential development. This site is some 4.68ha in size and the approximate site provision figure is around 100 dwellings.
- 2.2. Detailed development guidelines within Schedule S9.1(i) of draft Policy S9.1 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 scale and type/mix of uses proposed and the associated development guidelines within Schedule S9.1(i) of draft Policy S9.1 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 HNN016.
- 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. Part of the original site promotion (outside the proposed allocation) has been developed to provide affordable housing (planning permission 20/00193/FUL). This scheme has formed the access to this proposed allocation.
- 4.2. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. To date, no planning application has been received on proposed allocation HNN016.

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

Shropshire Council Response:

- 5.1. HNN016 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 settlement 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 HNN016 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 Highley and Shropshire.

- 5.3. The sites 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. A pedestrian crossing of Bridgnorth Road at an appropriate location in proximity of the site.
 - b. Enhancement of the public right of way through the site.
 - c. Ability to provide green infrastructure and open space, accessible to residents of the site and surrounding area.
- 5.5. More generally, it is also considered that development of HNN016 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 HNN016 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 HNN016.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HNN016 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 HNN016 within Schedule S9.1(i) of draft Policy S9.1 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. A very small component of the site is 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 is potentially within the setting of the Grade II Hazelwell's Farm House. As such, site guidelines require any planning application for the site to be accompanied by a heritage assessment. This will inform the site design and layout which will reflect and respect the site's heritage and heritage assets within the wider area, including this building. They also require strong and significant natural site boundaries and green infrastructure corridors which will be used to buffer and create appropriate settings for nearby heritage assets and built form.
 - c. A small part of within an environmental network / environmental network corridor. Site guidelines require all hedgerows, tree lines and mature trees on the site to be retained; and strong and significant natural site boundaries and green infrastructure corridors through the site will form an intrinsic component of this development. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - d. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this also applies to all the land in the immediate vicinity of Highley. This has been appropriately considered within the site assessment.

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 HNN016.

- 7.4. With specific regard to flood risk at HNN016, in summary:
 - a. With regard to fluvial flood risk, proposed allocation HNN016 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 HNN016 is located within the 100 year surface flood risk zone and around 3% of proposed allocation HNN016 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for HNN016 within Schedule S1.1(i) of draft Policy S9.1 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 HNN016. It concluded that the site HNN016 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 HNN016 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 HNN016.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HNN016

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 HNN016 within Schedule S9.1(i) of draft Policy S9.1 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 design and layout reflects and respects the site's heritage and heritage assets within the wider area; and responds to Highley's character and landscape setting.
 - b. Ensuring the provision of strong and significant natural site boundaries.
 - c. Providing a pedestrian crossing of Bridgnorth Road should be provided at an appropriate location in proximity of the site.
 - d. Retaining and enhancing the public right of way through the site.
 - e. Providing necessary improvements to the highway network.
 - f. Providing green infrastructure corridors through the site and open space that provide biodiversity enhancements and are easily accessible for residents on the site and in the surrounding area.
 - g. Retention and enhancement of the trees and hedgerows on the site.
 - h. 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 HNN016. 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:
- Policies SP3 and DP11 which address climate change and carbon emissions.
 - Policies SP5 and SP6 which address high-quality design and health and wellbeing.
 - Policies DP12 – DP24 which address the natural and historic environment.
 - 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 HNN016 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 also note that within their Regulation 19 consultation response (reference A0042), the promoter of HNN016 stated *"We can confirm that the site will be able to meet the Plan's development guidelines..."*. They also stated *"Allocation HNN016 is deliverable and viable."*

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 HNN016 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 2028/29. The Council also anticipates that development will progress at a rate of 36 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.
- 10.4. The Council would note that the promoter of this site specified within their Regulation 19 Representation (A0042) that *"It is likely to start to be delivered earlier than the Local Plan's current forecast of 2025-2030 in Local Plan Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations. We anticipate that the site's delivery will span the two periods 2020-2030."*

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 HNN016 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 HNN016.
- 11.3. The boundary for HNN016 is defined by agricultural field boundaries and country lanes/accesses to the north and east; a road to the south, beyond which is built form; and property curtilages to the west, beyond which is built form.

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 HNN016 within Schedule S1.1(i) of draft Policy S1.1 are effective, justified and consistent with national policy.

- 12.2. These guidelines address the key requirements and considerations for the development of HNN016; 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 HNN016.
- 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 HNN016 – 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 HNN016.
- 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 HNN016, 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 considered the site guidelines for HNN016 should include a requirement for a heritage assessment to inform any development of the site. Shropshire Council supports this proposal and an appropriate main modification has been proposed, as documented within GC4m. These representations are summarised in SD014.01 and GC4o.