

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 14**



## **Matter 14 - Ellesmere Place Plan Area (policy S8) – see MM085**

***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 Ellesmere Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Ellesmere Place Plan area is established within draft settlement policies S8.1-S8.4, and then appropriately expanded upon through the other policies of the draft Shropshire Local Plan.
- 1.3. These draft settlement policies align with and implement the proposed strategic approach to the level and distribution of development across Shropshire – particularly the principle of urban focus; but crucially are also responsive to the characteristics, constraints, and opportunities of the various settlements in the Place Plan area.
- 1.4. In positively responding to the characteristics, constraints and opportunities of the settlements in the Ellesmere Place Plan area, the draft Shropshire Local Plan identifies Ellesmere, Dudleston Heath, Cockshutt, Elson and Welsh Frankton as locations to accommodate development. Specifically:
  - a. Ellesmere is proposed to be identified as a Key Centre where growth will respond to local needs and contribute towards achieving strategic growth objectives in the north-west of the County consistent with the requirements of Policy S8.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Ellesmere envisage the delivery of around 800 dwellings and 9ha of employment land between 2016 and 2038.
  - b. Dudleston Heath is a significant rural service centre, as such it is proposed to be identified as a Community Hub where new development will respond to local needs consistent with Policy S8.2, Policy SP8, and other relevant policies of the Shropshire

Local Plan. Proposed development guidelines for Dudleston Heath envisage the delivery of around 60 dwellings between 2016 and 2038.

- c. Cockshutt, Elson and Welsh Frankton are all proposed to be identified as Community Clusters where new development will respond to local needs, consistent with the requirements of Policy S8.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of these settlements, no specific development guidelines or allocations are proposed.
- 1.5. In identifying site allocations to contribute to the achievement of the strategies proposed for Ellesmere and Dudleston Heath, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
  - 1.6. Through this process one proposed residential site allocation was identified at Ellesmere (ELL005 & ELL008 & ELL033); however it was ultimately concluded that no allocations were necessary at Dudleston Heath. This assessment work is summarised within Appendix I (SD006.10) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
  - 1.7. The Ellesmere 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 Ellesmere Place Plan area was identified as a potential location to accommodate proposed contributions to the Black Country.
  - 1.8. Shropshire Council considers that development proposals in the Place Plan area will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire; contribute to the achievement of sustainable development that meets the needs of all groups within the communities of the Place Plan area; and support the long-term sustainability of Shropshire.
  - 1.9. The Council considers the proposed approach to development in the Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan. 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).

- 1.10. 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.
- 1.11. 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 ELL005 & ELL008 & ELL033 – Land south of Oswestry Road, Ellesmere**

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

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

- 1.1. This proposed allocation lies to the south-west of Ellesmere. It consists of one large agricultural field, a series of smaller agricultural fields, and a residential property and its curtilage. ELL033 contains the access to the adjoining existing allocations ELL003a and ELL003b. It is considered that this proposed allocation will complement existing allocations ELL003a and ELL003b.
- 1.2. The site is bounded by the A495 and the curtilage of Lakelands Academy to the north, the curtilage of Lakelands Academy to the east, an existing mixed-use allocation that is subject to planning permission for enabling works to the south, and an agricultural field boundary to the west.

- 1.3. To inform the identification of proposed site allocations, including ELL005 & ELL008 & ELL033, 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 I (SD006.10) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 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 Ellesmere 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 24 sites were considered at Ellesmere. Within Stage 3 of the site assessment process, around 16 sites were considered at Ellesmere.
- 1.12. ELL005 & ELL008 & ELL033 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 covered the extent of sites ELL005 & ELL008, which was subject to and informed by a Regulation 18 Plan-Making consultation (EV005.01). Subsequently, the proposed allocation was extended to include ELL033, where it was subject to and informed by a Regulation 18 Plan-Making consultation (EV007.01).
- 1.14. The site was also subsequently subject to the Regulation 19 Pre-Submission Consultation and ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033. These objections These objections are summarised in SD014.01 and GC4o.

1.16. They included:

- a. The capacity of ELL005 & ELL008 & ELL033 is too high. Shropshire Council has been clear within draft Policy S8.1 that the site provision figure for ELL005 & ELL008 & ELL033 "*approximate*".

The capacity attributed to this proposed allocation within the Council's assessment of housing land supply (GC47) has been informed by best available data. Specifically GC47 assumes the delivery of 107 dwellings on the site.

This is lower than the approximate site provision figure, recognising the capacity of the planning permission (21/03602/FUL) granted on much of the site and the fact that the remainder is now linked to the delivery of the existing mixed-use allocations ELL003a & ELL003b, enabling development for which has been granted planning permission (23/02170/FUL).

This is also reflected within the total commitments identified to achieve the proposed housing requirement for Ellesmere, which the Council considers remains achievable.

- b. The allocation alongside other commitments concentrates too much of the development of Ellesmere to the south-west of the settlement, where development has historically been slow and is reducing choice and competition.

Shropshire Council considers the proposed allocation constitutes a suitable location for development which has been identified through a proportionate and robust site assessment process.

The Council also considers that an appropriate and deliverable supply of housing land has been facilitated through the draft Shropshire Local Plan.

This supply will contribute to the achievement of the proposed development strategy for Ellesmere, which has had due regard to the settlements specific characteristics, constraints, and opportunities and is considered appropriate, effective, sustainable and deliverable.

- 1.17. In conclusion, Shropshire Council considers that ELL005 & ELL008 & ELL033 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. ELL005 & ELL008 & ELL033 is proposed to be allocated for residential development. This site is some 9.50ha in size and the approximate site provision figure is around 170 dwellings.
- 2.2. However, the capacity attributed to this proposed allocation within the Council's assessment of housing land supply (GC47) has been informed by best available data. Specifically GC47 assumes the delivery of 107 dwellings on the site. This is lower than the approximate site provision figure, recognising the capacity of the planning permission (21/03602/FUL) granted on much of the site and the fact that the remainder is now linked to the delivery of the existing mixed-use allocations ELL003a & ELL003b, enabling development for which has been granted planning permission (23/02170/FUL).
- 2.3. This is also reflected within the total commitments identified to achieve the proposed housing requirement for Ellesmere, which the Council considers remains achievable.
- 2.4. Detailed development guidelines within Schedule S8.1(i) of draft Policy S8.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the remainder of the site.
- 2.5. The specific residential development mix on the remainder of 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 S8.1(i) of draft Policy S8.1 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 ELL005 & ELL008 & ELL033.
- 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. However, the Council would note that the capacity attributed to this proposed allocation within its assessment of housing land supply (GC47) has been informed by best available data. Specifically GC47 assumes the delivery of 107 dwellings on the site. This is lower than the approximate site provision figure, recognising the capacity of the planning permission (21/03602/FUL) granted on much of the site and the fact that the remainder is now linked to the delivery of the existing mixed-use allocations ELL003a & ELL003b, enabling development for which has been granted planning permission (23/02170/FUL).

**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 ELL005) benefits from planning permission (21/03602/FUL) for 107 dwellings and development is currently ongoing.
- 4.2. The remainder of the site (aligning with the extent of ELL008 & ELL033) is now associated with the delivery of the existing mixed-use allocations ELL003a & ELL003b. Enabling works to facilitate this development now benefit from planning permission (23/02170/FUL).
- 4.3. These permitted enabling works include formation of a link road (with footway and cycleway provision) between Ellesmere Business Park Roundabout (A495) and Canal Way; recontouring and earthworks throughout the site; and formation of flood compensation areas.

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

**Shropshire Council Response:**

- 5.1. ELL005 & ELL008 & ELL033 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, as a component of the site (that aligns with ELL008 & ELL033) is now associated with the delivery of the existing mixed-

use allocations ELL003a & ELL003b, it will facilitate the delivery of this development and the associated benefits which include:

- a. Provision of housing to contribute to meeting the needs of all groups within the settlement and other communities in the Place Plan area.
  - b. Provision of various related leisure and tourism facilities suitable to a canal side rather than town centre location. This includes such uses as a hotel, marina, leisure centre, touring caravan/log cabin sites, and a garden centre.
- 5.3. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of ELL005 & ELL008 & ELL033 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 Ellesmere and Shropshire.
- 5.4. 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.
- 5.5. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. Ensuring connectivity (particularly pedestrian and cycle links) between the various components of the site.
  - b. Provision of a pedestrian crossing facility over the A495.
  - c. Ability to provide green infrastructure and open space that links to green spaces within the existing allocation ELL003a & ELL003b to the south and the surrounding area, with the intention of creating a circular route for pedestrians, dog-walkers and cyclists.
  - d. Pedestrian and cycle connectivity to the nearby canal towpath.
  - e. Potential to de-culvert Newnes Brook.
- 5.6. More generally, it is also considered that development of ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033 within Schedule S8.1(i) of draft Policy S8.1 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. Potential recreational impacts in-combination on Cole Mere and Fenns etc. Site guidelines require appropriate mitigation measures to remove any adverse effects from development of the site on the integrity of internationally designated sites. They also support the achievement of a circular route for pedestrians, dog-walkers and cyclists and links to the canal towpath. Settlement Policy S8.1 (supported by draft Policies DP12, DP14 and DP15) also recognise this and requires appropriate mitigation to remove any adverse effect. Mitigation measures for recreational impacts are identified in the Habitats Regulation Assessment (HRA) (SD008.01). They include measures to increase accessibility to local open space and increase open space provision within a development.
  - b. Highway network requires improvements to support this development. Site guidelines require any necessary improvements to the local and strategic road network will be undertaken; access into each component of the site to be complementary; and an appropriate pedestrian crossing facility over the A495.

- c. Noise associated with the adjoining road (A495). Site guidelines require design and layout should minimise noise impact from adjacent road.
- d. The site contains part of an environmental network corridor along the railway line and there are significant trees and hedgerows present. Site guidelines require an appropriate buffer (minimum 10m) to Newnes Brook should be provided to create an environmental corridor and provision of open space which will accommodate this environmental network.
- e. A component of the site is located within the fluvial flood risk zone and/or the surface water flood risk zone. The site is also within 20m of a detailed river network. Site guidelines require development to be excluded from flood zones 2 and 3. They also require appropriate sustainable drainage to be implemented and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- f. The site has medium-high visual sensitivity. This has been appropriately considered within the site assessment.
- g. Applying the precautionary principle, the site consists of best and most versatile agricultural land/ However, this also applies to the majority of the land around Ellesmere. 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 ELL005 & ELL008 & ELL033.

- 7.4. With specific regard to flood risk at ELL005 & ELL008 & ELL033, in summary:
- a. With regard to fluvial flood risk, around 10% of proposed allocation ELL005 & ELL008 & ELL033 is located within Flood Zone 2 and around 7% of proposed allocation ELL005 & ELL008 & ELL033 is located within Flood Zone 3 (please note, flood zones 2 and 3 overlap).
  - b. With regard to other sources of flood risk, around 0.2% of proposed allocation ELL005 & ELL008 & ELL033 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for ELL005 & ELL008 & ELL033 within Schedule S8.1(i) of draft Policy S8.1 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. Development will also be excluded from the portions of the site located in Flood Zones 2 and/or 3. 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 ELL005 & ELL008 & ELL033. It concluded that as a result of proposed site guidelines which exclude development from the portions of the site in flood zones 2 and/or 3, the site ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033.

- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033 within Schedule S8.1(i) of draft Policy S8.1 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). The site guidelines include:
- a. Ensuring the comprehensive development of the site – including provision of complementary pedestrian, cyclist and vehicular accesses into each component of the site.
  - b. Ensuring that pedestrian, cyclist and vehicular accesses to the site complement the access to the adjoining existing allocation ELL003a & ELL003b.
  - c. Providing of an appropriate pedestrian crossing facility over the A495.
  - d. Providing necessary improvements to the local and strategic road network.
  - e. Providing necessary mitigation to remove any adverse effects on the integrity of internationally designated sites.
  - f. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
  - g. Ensuring development is excluded from flood risk zones 2 and 3.
  - h. Providing open space that links to green spaces and public rights of way within the existing allocation ELL003a & ELL003b and the surrounding area, with the intention of creating a circular route for pedestrians, dog-walkers and cyclists.
  - i. Investigate and if possible, implement de-culverting Newnes Brook.
  - j. Retention and enhancement of the trees and hedgerows on the site.
  - k. Design and layout to minimise noise impact from adjacent road.

- 8.5. 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.
- 8.6. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of ELL005 & ELL008 & ELL033. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.7. 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.
- 8.8. 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 ELL005 & ELL008 & ELL033 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:
  - a. Within their Regulation 19 consultation response (reference A0588), the promoter of ELL008 & ELL033 stated *"The land is available, viable and deliverable and will be brought forward at the earliest opportunity."*

- b. Within correspondence related to the Viability and Deliverability Topic Paper (EV113), the promoters of ELL005 states "...for the avoidance of doubt I can confirm this is viable, deliverable and that we hope to commence development in 2021."

9.4. The Council would also note that:

- a. A significant component of the site (aligning with the extent of ELL005) benefits from planning permission (21/03602/FUL) for 107 dwellings and development is currently ongoing.
- b. The remainder of the site (aligning with the extent of ELL008 & ELL033) is now associated with the delivery of the existing mixed-use allocations ELL003a & ELL003b. Enabling works to facilitate this development now benefit from planning permission (23/02170/FUL).

**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 ELL005 & ELL008 & ELL033 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. Importantly, a significant component of the site (aligning with the extent of ELL005) benefits from planning permission (21/03602/FUL) for 107 dwellings and development is currently ongoing. The forecasting within GC47 recognises this and anticipates this component of the site will be completed in 2027/28. The Council also anticipates development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. The remainder of the site (aligning with the extent of ELL008 & ELL033) is now associated with the delivery of the existing mixed-use allocations ELL003a & ELL003b. Enabling works to facilitate this development now benefit from planning permission (23/02170/FUL).
- 10.4. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.



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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation ELL005 & ELL008 & ELL033 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 ELL005 & ELL008 & ELL033.
- 11.3. The boundary for ELL005 & ELL008 & ELL033 is defined by the A495 and the curtilage of Lakelands Academy to the north, the curtilage of Lakelands Academy to the east, an existing mixed-use allocation that is subject to planning permission for enabling works to the south, and an agricultural field boundary to the west.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for ELL005 & ELL008 & ELL033 within Schedule S8.1(i) of draft Policy S8.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of ELL005 & ELL008 & ELL033; 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 ELL005 & ELL008 & ELL033.
- 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 ELL005 & ELL008 & ELL033 – 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 ELL005 & ELL008 & ELL033.
- 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 ELL005 & ELL008 & ELL033, which is a ‘golden thread’ through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Representations during the Regulation 19 Pre-Submission Consultation are summarised in SD014.01 and GC4o. They did not include any significant objections to specific site guidelines proposed for ELL005 & ELL008 & ELL033. They did however include an objection to the approximate site provision figure, with the objection considering this figure to be too high.
- 12.9. Shropshire Council has been clear within draft Policy S8.1 that the site provision figure for ELL005 & ELL008 & ELL033 “*approximate*”. The capacity attributed to this proposed allocation within the

Council's assessment of housing land supply (GC47) has been informed by best available data. Specifically GC47 assumes the delivery of 107 dwellings on the site.

- 12.10. This is lower than the approximate site provision figure, recognising the capacity of the planning permission (21/03602/FUL) granted on much of the site and the fact that the remainder is now linked to the delivery of the existing mixed-use allocations ELL003a & ELL003b, enabling development for which has been granted planning permission (23/02170/FUL).