

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 8**



## **Matter 8 - Bishop's Castle Place Plan Area (policy S2) – see MM080**

***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 Bishops Castle Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Bishops Castle Place Plan area is established within draft settlement policies S2.1-S2.4, 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 Bishops Castle Place Plan area, the draft Shropshire Local Plan identifies Bishops Castle; Buckell; Chirbury; Clun; Worthen & Brockton; Abcot, Beckjay, Clungunford, Hopton Heath, Shelderton and Twitchen (Three Ashes); Brompton, Marton, Middleton, Pentreheyling, Priest Weston, Stockton and Rorrington; Lydbury North; Newcastle and Whitcott Keysett; and Wentnor and Norbury. as suitable locations to accommodate development. Specifically:
  - a. Bishops Castle is identified as a Key Centre where growth will respond to local needs and contribute towards achieving strategic growth objectives in the south-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 Bishops Castle envisage the delivery of around 150 dwellings and around 3 hectares of employment land between 2016 and 2038. A Neighbourhood Plan for Bishops Castle was 'made' on 18<sup>th</sup> July

2024. This Neighbourhood Plan provides the strategy for achieving the sustainable growth of Bishops Castle, including the proposed housing and employment land guidelines for the settlement in the draft Shropshire Local Plan, including a new residential site allocation for 40 dwellings.

- b. Bucknell, Chirbury, Clun and Worthen & Brockton are identified as Community Hubs. These Community Hubs are considered significant rural service centres and a focus for development within the rural area, consistent with Policy S8.2, Policy SP8, and other relevant policies of the Shropshire Local Plan. Each community hub has its own residential development guideline as follows – Bucknell around 110 dwellings, Chirbury around 45 dwellings, Clun around 95 dwellings and Worthen & Brockton around 55 dwellings.
  - c. Five Community Clusters are identified, these are Abcot, Beckjay, Clungunford, Hopton Heath, Shelderton and Twitchen (Three Ashes); Brompton, Marton, Middleton, Pentreheyling, Priest Weston, Stockton and Rorrington; Lydbury North; Newcastle and Whitcott Keysett; and Wentnor and Norbury. Within these Community Cluster, new development will respond to local needs and enhance the sustainability of these communities, 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 are proposed.
- 1.5. In identifying site allocations to contribute to the achievement of the strategies proposed for Bishop’s Castle, Bucknell, Chirbury, Clun and Worthen & Brockton 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 Bucknell (BKL008a); two proposed residential site allocations were identified at Chirbury (CHR001 and CHR002); one proposed site allocation was identified at Clun (CLU005); and two proposed site allocations were identified at Worthen & Brockton (WBR007 and WBR010). As a Neighbourhood Plan was being progressed for Bishops Castle which would provide the strategy for achieving the sustainable growth of Bishops Castle, it was ultimately concluded that no allocations were necessary. This assessment work is summarised within Appendix I (SD006.10) of the of Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.7. The Bishops Castle 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 Bishops

Castle 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, 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 BKL008a (northern portion) – Land adjoining Redlake Meadow on B4367, Bucknell**

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

**Shropshire Council Response:**

- 1.1. The proposed site allocation BKL008a forms part of an agricultural field and lies on the eastern edge of the built form of Bucknell. The site is bound to the north by the B4367, the built form of Bucknell is to the west and agricultural land to the east. To the south lies the remaining part of the agricultural field which separates the site from the River Redlake.
- 1.2. To inform the identification of proposed site allocations, including BKL008a, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix C (SD006.04) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or

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

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bishops Castle 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 11 sites were considered at Bucknell. Within Stage 3 of the site assessment process, around 8 sites were considered at Bucknell.
- 1.11. BKL008a 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 BKL008a 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 allocation/assessment process undertaken to identify proposed allocation BKL008a. These objections included:
- a. The brownfield site in Bucknell should be developed rather than this greenfield site. Development should not be at the expense of important agricultural land, especially close to the AONB: Shropshire Council considers that the proposed allocation has been informed by a proportionate and robust site assessment process which has fully taken into account agricultural land quality and visual amenity.
  - b. The allocation is unsound as there insufficient engagement with Bucknell residents: Shropshire Council considers the settlement strategy is clearly explained within the draft Shropshire Local plan and has been subject to several stages of plan making consultation.
  - c. The site may not be deliverable as the land may be needed for restoration measures for the River Clun SAC and the proposed allocation may not be compatible with the Dutch Nitrogen Judgement. Shropshire Council considers that this matter has been comprehensively considered through the Habitats Regulations Assessment (HRA) undertaken in support of the draft Shropshire Local Plan. Furthermore, draft Policy DP13 ensures that development of the site cannot occur until such time as a Restoration Plan for the River Clun SAC is sufficiently progressed that appropriate mitigation measures can be identified that achieve nutrient neutrality without undermining the ability of achieving restoration. The Council would note that this position has been generally accepted within recent correspondence from Natural England (OD007) and is consistent with the conclusions of the examiner of the Bishops Castle Neighbourhood Plan.
- 1.14. In conclusion, Shropshire Council considers that BKL008a 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. BKL008a is proposed to be allocated for residential development. This site is some 0.85ha in size and the approximate site provision figure is around 20 dwellings.
- 2.2. Detailed development guidelines within Schedule S2.2(i) of draft Policy S2.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S2.2(i) of draft Policy S2.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation BKL008a.
- 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. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. No planning applications have yet been received for proposed allocation BKL008a.
- 4.2. Shropshire Council anticipates that development of the site will not commence until towards the end of the plan period - beginning in 2035/36 and continue through until 2037/38, in order to allow for suitable progression of a Restoration Plan for the River Clun Special



Area of Conservation (SAC), so that appropriate mitigation measures can be identified that achieve nutrient neutrality without undermining the ability of achieving restoration of the River Clun SAC.

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

**Shropshire Council Response:**

- 5.1. BKL008a is 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 BKL008a 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 Bucknell 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 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. Ensuring the comprehensive development of the site – including provision of pedestrian access and appropriate road crossing to link to the wider pedestrian network and bus stop to the north of the site (from BKL008a).
  - b. Potential to extend the speed restriction beyond the new junction and provide traffic calming.
  - c. Potential to create a footway link into the Redlake Meadow estate.
- 5.5. More generally, it is also considered that development of BKL008a 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 BKL008a 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 BKL008a.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BKL008a 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 BKL008a within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. The site allocation, along with the whole of Bucknell lies within the catchment for the River Clun which is a designated Special Area of Conservation (SAC), notified solely for the presence of Freshwater Pearl Mussels. Development within the River Clun catchment is likely to have an adverse effect on the River Clun SAC. Draft Policy S2.2 recognises this and in order to protect the River Clun SAC the site guidelines requires relevant supporting studies to be undertaken with full drainage information to be provided and recommendations of the studies to be clearly reflected within the development scheme. Furthermore, draft policy DP13 ensures protection of the integrity of the River Clun SAC requiring nutrient neutrality or nutrient betterment.
  - b. The site is close to the River Redlake Local Wildlife Site and the site guidelines require this to be taken into account. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. The majority of the site allocation is located within a mineral safeguarding area. This has been appropriately considered within the site assessment process.

- d. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Bucknell. 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 BKL008a.
- 7.4. With specific regard to flood risk at BKL008a, in summary:
  - a. With regard to fluvial flood risk, proposed allocation BKL008a, is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, none of the proposed allocation BKL008a is located within the 30 year surface flood risk zones, 100 year surface flood risk zones or within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for BKL008a within Schedule S2.2(i) of draft Policy S2.2, states *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk may be managed on part of the remaining land to ensure flood and water management measures do 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 BKL008a. It concluded that the site BKL008a

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 BKL008a 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 BKL008a.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BKL008a 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.
- 8.3. The draft site guidelines for BKL008a within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring the comprehensive development of the site – creating a new gateway to the eastern side of the village.
  - b. Providing an appropriate access to the site.
  - c. Extension of the speed restriction and traffic calming measures on the B4367.

- d. Enhancing pedestrian links and providing an appropriate road crossing to link to services and facilities in the village including the bus stop to the north.
  - e. Retention of the trees and hedgerows on the site and provision of compensatory planting especially for hedgerow removal to create the highway access to B4367.
  - f. Providing sustainable drainage and any residual surface water flood risk maybe managed on the land to ensure floor and water management measures do not displace water elsewhere.
  - g. Providing appropriate drainage to ensure protection of the River Clun SAC.
- 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 BKL008a. 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 BKL008a 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 A0547), the promoter of BKL008a stated "*the site highly deliverable, an options agreement with a developer has been agreed and the site can be developed and delivered within a short time period.*"

**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 BKL008a 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, Shropshire Council anticipates that development of the site will not commence until towards the end of the plan period - beginning in 2035/36 and continue through until 2037/38, in order to allow for suitable progression of a Restoration Plan for the River Clun Special Area of Conservation (SAC), so that appropriate mitigation measures can be identified that achieve nutrient neutrality without undermining the ability of achieving restoration of the River Clun SAC.
- 10.3. The Council also anticipates that development will progress at a rate of 10 dwellings per annum, consistent with standard assumptions for a site of this scale in this part of Shropshire.
- 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 BKL008a 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 BKL008a.

**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 BKL008a within Schedule S2.2(i) of draft Policy S2.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BKL008a; 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 BKL008a.
- 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 BKL008a – 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 BKL008a.

- 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 BKL008a, 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 representation during the Regulation 19 Pre-Submission Consultation included objection to the site guidelines proposed for BKL008a. The objection considers the draft guidelines in respect of contribution to historic character, enhancement of AONB and countryside setting to the east are unachievable: Shropshire Council considers the development guidelines to be deliverable.

### **Questions: Site Allocation CHR001 – Land between Orchard House and Crofton, Chirbury**

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

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

- 1.1. This proposed allocation lies to the north of the village of Chirbury. It comprises an agricultural field, bounded by the B4386 on the east



side; residential curtilages to the north and south; and the proposed allocation boundary within an agricultural field to the west.

- 1.2. To inform the identification of proposed site allocations, including CHR001, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix C (SD006.04) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.

- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bishops Castle 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 2 sites were considered at Chirbury. Those 2 sites were taken forward to Stage 3 of the site assessment process.
- 1.11. CHR001 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 CHR001 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that no representations were received during the Regulation 19 Pre-submission Consultation in relation to proposed allocation CHR001.
- 1.14. In conclusion, Shropshire Council considers that CHR001 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. CHR001 is proposed to be allocated for residential development. This site is some 0.26ha in size and the approximate site provision figure is around 7 dwellings.
- 2.2. Detailed development guidelines within Schedule S2.2(i) of draft Policy S2.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S2.2(i) of draft Policy S2.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CHR001.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation.
- 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 applications have yet been received for proposed allocation CHR001.

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

**Shropshire Council Response:**

- 5.1. CHR001 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 CHR001 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 Chirbury and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Ensuring the comprehensive development of the site to complement its gateway location.
  - b. Ability to enhance pedestrian links and provide an appropriate road crossing to link with the wider pedestrian network in the village.
- 5.5. More generally, it is also considered that development of CHR001 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 CHR001 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 CHR001.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CHR001

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 CHR001 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Chirbury is an historic settlement with a significant Conservation Area which includes most of the village. The site has also been identified as close to the former precinct of Chirbury Priory (HER PRN 02570) within the Sustainability Appraisal and Site Assessment process. The draft site guidelines expect development to safeguard historic environment assets. Furthermore, Draft Policy DP23 ensures the protection, conservation and sympathetic enhancement/restoration of designated and non- designated heritage assets, including their settings.
  - b. The site falls within an area where development has potential to impact the Stiperstones & The Hollies SAC through increased recreational pressures. Draft policy S2.2 recognises this and stipulates that mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in Chirbury on the integrity of the Stiperstones and Hollies SAC. This is further supported by Draft Policies DP12, DP14 and DP15 which specifically provides expectations to appropriately manage open space provision where such an impact has been identified.
  - c. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to all of the land around Chirbury. This has been appropriately considered within the site assessment.
  - d. The site has medium-high landscape and visual sensitivity. This has been appropriately considered within the site assessment process.

**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 CHR001.
- 7.4. With specific regard to flood risk at CHR001, in summary:
  - a. With regard to fluvial flood risk, proposed allocation CHR001 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, none of proposed allocation CHR001 is located within the 30, 100 or 1,000 year surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including CHR001. It concluded that the site CHR001 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of CHR001 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 CHR001.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CHR001 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.
- 8.3. The draft site guidelines for CHR001 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include provision of a pedestrian footway along the sites frontage and appropriate road crossing to link into the wider pedestrian 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 CHR001. 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 CHR001 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 CHR001 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 the entirety of the site will be developed in 2028/29. 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. The boundary for CHR001 is defined by the B4368 to the east, residential properties bound the north and south, to the west lies the remaining part of the agricultural field.
- 11.2. Shropshire Council considers the boundary for proposed allocation CHR001 is entirely appropriate and there is no justification for its amendment.
- 11.3. 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 CHR001.

**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 CHR001 within Schedule S2.2(i) of draft Policy S2.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of CHR001; 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 CHR001.
- 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 CHR001 – 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 CHR001.
- 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 CHR001, 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.

**Questions: Site Allocation CHR002 – Land south of the A490, Chirbury**

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

**Shropshire Council Response:**

- 1.1. The proposed allocation lies on the southern edge of Chirbury and is part of an agricultural field. The site is bounded by the A490 which runs along the north-eastern boundary, beyond which lies an existing allocation within the adopted Development Plan (CHIR001); a property curtilage to the north-west; and the extent of the site within an agricultural field to south-west and south-east.

- 1.2. To inform the identification of proposed site allocations, including CHR002, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix C (SD006.04) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.

- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bishops Castle 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 2 sites were considered at Chirbury. Those 2 sites were taken forward to Stage 3 of the site assessment process.
- 1.11. CHR002 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 CHR002 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that no representations were received during the Regulation 19 Pre-submission Consultation in relation to proposed allocation CHR002.
- 1.14. In conclusion, Shropshire Council considers that CHR002 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. CHR002 is proposed to be allocated for residential development. This site is some 0.29ha in size and the approximate site provision figure is around 7 dwellings.
- 2.2. Detailed development guidelines within Schedule S2.2(i) of draft Policy S2.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S2.2(i) of draft Policy S2.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CHR002.
- 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 applications have yet been received for proposed allocation CHR002.

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

**Shropshire Council Response:**

- 5.1. CHR002 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 CHR002 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 Chirbury and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Potential to extend the 30mph zone on A490.
  - b. Ability to enhance pedestrian network to link into the village.
- 5.5. More generally, it is also considered that development of CHR002 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 CHR002 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 CHR002.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CHR002 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 CHR002 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Chirbury is an historic settlement with a significant Conservation Area which includes most of the village. The site allocation lies outside of the Conservation Area; however the setting of the historic settlement could be affected by the development. As such the draft site guidelines expect development to safeguard historic environment assets. Furthermore, Draft Policy DP23 ensures the protection, conservation and sympathetic enhancement/restoration of designated and non- designated heritage assets, including their settings.
  - b. The site falls within an area where development has potential to impact the Stiperstones & The Hollies SAC through increased recreational pressures. Draft policy S2.2 recognises this and stipulates that mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in Chirbury on the integrity of the Stiperstones and Hollies SAC. This is further supported by Draft Policies DP12, DP14 and DP15 which specifically provides expectations to appropriately manage open space provision where such an impact has been identified.
  - c. Noise associated with the A490 could impact amenity of occupiers on the site allocation. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
  - d. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to all of the land around Chirbury. 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 CHR002.
- 7.4. With specific regard to flood risk at CHR002, in summary:
  - a. With regard to fluvial flood risk, proposed allocation CHR002 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, none of proposed allocation CHR002 is located within the 30, 100 or 1,000 year surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including CHR002. It concluded that the site CHR002 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.



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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of CHR002 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 CHR002.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CHR002 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 CHR002 within Schedule S2.2(i) of draft policy S2.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Provision of a pedestrian footway along the site frontage to link into the wider pedestrian network.
  - b. Expansion of the 30mph zone on the A490.
- 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 CHR002. 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 CHR002 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 CHR002 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 the entirety of the site will be developed in 2028/29. 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. The boundary for CHR002 is defined by the A490 which runs along the north-eastern boundary, beyond which lies an existing allocation within the adopted Development Plan (CHIR001); a property curtilage to the north-west; and the extent of the site within an agricultural field to south-west and south-east.
- 11.2. Shropshire Council considers the boundary for proposed allocation CHR002 is entirely appropriate and there is no justification for its amendment.
- 11.3. 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 CHR002.

**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 CHR002 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 CHR002; 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 CHR002.
- 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 CHR002 – 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 CHR002.
- 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 CHR002, 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.

**Questions: Site Allocation CLU005 – Land at Turnpike Meadow on B4368, Clun**

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

**Shropshire Council Response:**

- 1.1. The proposed allocation is currently part of an agricultural field adjacent to an existing residential allocation (Saved SAMDev Allocation CLUN002, yet to be delivered) on the east side of Clun. To

the south lies the B4368, beyond which is a cemetery and mix of residential and employment uses. The land to the north and east of the proposed allocation predominately consists of agricultural fields.

- 1.2. To inform the identification of proposed site allocations, including CLU005, 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 Bishops' Castle 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 5 sites were considered at Clun. Within Stage 3 of the site assessment process, around 2 sites were considered at Clun.
- 1.11. CLU005 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 CLU005 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 objection to the site assessment process undertaken to identify proposed allocation CLU005.
- 1.14. The objection included that the site may not be deliverable as the land may be needed for restoration measures for the River Clun SAC and the proposed allocation may not be compatible with the Dutch Nitrogen Judgement.
- 1.15. Shropshire Council considers that this matter has been comprehensively considered through the Habitats Regulations

Assessment (HRA) undertaken in support of the draft Shropshire Local Plan.

- 1.16. Furthermore, draft Policy DP13 ensures that development of the site cannot occur until such time as a Restoration Plan for the River Clun SAC is sufficiently progressed that appropriate mitigation measures can be identified that achieve nutrient neutrality without undermining the ability of achieving restoration. The Council would note that this position has been generally accepted within recent correspondence from Natural England (OD007) and is consistent with the conclusions of the examiner of the Bishops Castle Neighbourhood Plan.
- 1.17. In conclusion, Shropshire Council considers that CLU005 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. CLU005 is proposed to be allocated for residential development. This site is some 0.88ha in size and the approximate site provision figure is around 20 dwellings.
- 2.2. Detailed development guidelines within Schedule S2.2(i) of draft Policy S2.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S2.2(i) of draft Policy S2.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation CLU005.

- 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 applications have yet been received for proposed allocation CLU005.
- 4.2. Shropshire Council anticipates that development of the site will not commence until towards the end of the plan period - beginning in 2035/36 and continue through until 2037/38, in order to allow for suitable progression of a Restoration Plan for the River Clun Special Area of Conservation (SAC), so that appropriate mitigation measures can be identified that achieve nutrient neutrality without undermining the ability of achieving restoration of the River Clun SAC.

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

**Shropshire Council Response:**

- 5.1. CLU005 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 CLU005 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 Clun and Shropshire.
- 5.3. The site forms a natural extension to the east side of Clun and would extend the built form of the settlement away from the historic core 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. Ability to enhance pedestrian and cycle routes linking to local networks.
- b. Potential for speed restriction to be repositioned beyond new junction and extended along the site frontage with traffic calming measures.
- c. Ability to provide green infrastructure and open space, and incorporation of the Public Right of Way through the site.

5.4. More generally, it is also considered that development of CLU005 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 CLU005 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 CLU005.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CLU005 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 CLU005 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. The site allocation, along with the whole of Clun lies within the catchment for the River Clun which is a designated Special Area of Conservation (SAC) notified solely for the presence of Freshwater Pearl Mussels. Development within the River Clun catchment is likely to have an adverse effect on the River Clun SAC. Draft policy S2.2 recognises this and in order to protect the River Clun SAC the site guidelines require relevant supporting

studies to be undertaken with full drainage information to be provided and recommendations of the studies to be clearly reflected within the development scheme. Furthermore, draft policy DP13 ensures protection of the integrity of the River Clun SAC requiring nutrient neutrality or nutrient betterment.

- b. Clun, along with this site allocation, lies fully within the Shropshire Hills National Landscape. The site guidelines recognise the importance of this sensitive landscape, requiring a landscape assessment to be produced to consider the impact on the Shropshire Hills National Landscape. Furthermore, Draft policy DP24 sets out the specific expectations for development within the Shropshire Hills National Landscape.
- c. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- d. Clun is an historic settlement with a number of listed buildings and significant Conservation Area which includes most of the town. The site allocation lies outside of the Clun Conservation Area however there could be an impact on the setting because of the development. There could also be an impact on the setting of the listed Almshouses to the northwest of the site. The site guidelines recognise this and expects development to consider any impact through a heritage assessment. Furthermore, Draft Policy DP23 ensures the protection, conservation and sympathetic enhancement/restoration of designated and non-designated heritage assets, including their settings.
- e. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.

**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 CLU005.
- 7.4. With specific regard to flood risk at CLU005, in summary:
  - a. With regard to fluvial flood risk, proposed allocation CLU005 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 10% of proposed allocation CLU005 is located within the 30 year and 100 year surface flood risk zones and around 20% of proposed allocation CLU005 is located within the 1,000 year surface flood risk zones.
- 7.5. The proposed site guidelines for CLU005 within Schedule S2.2(i) of draft Policy S2.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including CLU005. It concluded that the site CLU005 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 CLU005 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 CLU005.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CLU005 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 CLU005 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Provision of pedestrian and cycle routes linking to local networks.
  - b. Repositioning of 30mph speed restriction and introduction of traffic calming measures.
  - c. 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 CLU005. 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 CLU005 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 CLU005 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, Shropshire Council anticipates that development of the site will not commence until towards the end of the plan period - beginning in 2035/36 and continue through until 2037/38, in order to allow for suitable progression of a Restoration Plan for the River

Clun Special Area of Conservation (SAC), so that appropriate mitigation measures can be identified that achieve nutrient neutrality without undermining the ability of achieving restoration of the River Clun SAC.

- 10.3. The Council also anticipates that development will progress at a rate of 10 dwellings per annum, consistent with standard assumptions for a site of this scale in this part of Shropshire.
- 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 CLU005 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 CLU005.
- 11.3. The boundary for CLU005 is defined by the B4368 to the south, agricultural fields to the north and east. The boundary to the west is currently an agricultural field, however this land is allocated for residential development (Saved SAMDev Allocation CLUN002).

**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 CLU005 within Schedule S2.2(i) of draft Policy S2.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of CLU005; 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 CLU005.

- 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 CLU005 – 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 CLU005.
- 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 CLU005, 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.

## **Questions: Site Allocation WBR007 & WBR008 – Land at Bank Farm, Worthen**

**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 would form part of the Worthen & Brockton Community Hub. The site itself lies on the north-eastern edge of Worthen. Part of the site (WBR007) is currently an agricultural field used for rough grazing/pasture. The other part of the site (WBR008) comprises entirely of agricultural buildings, hardstanding and a former slurry pit.
- 1.2. Site boundaries are formed by agricultural field boundaries to the north and east; property curtilages to the west and residential curtilages and the B4386 to the south.
- 1.3. To inform the identification of proposed site allocations, including WBR007 & WBR008, 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 C (SD006.04) 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 Bishops Castle 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 13 sites were considered for Worthen and Brockton. Within Stage 3 of the site assessment process, around 10 sites were considered for Worthen and Brockton.
- 1.12. WBR007 & WBR008 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.

- 1.13. 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 WBR007 & WBR008 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of WBR007 & WBR008 as a proposed allocation. These objections included:
- a. The site would have a negative impact on views to/from the Shropshire Hills National Landscape: Shropshire Council considers a robust and proportionate site assessment process has been undertaken, which has taken account of landscape and visual sensitivity.
  - b. Cumulative impact of proposals mean this does not constitute sustainable development. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken. The process and conclusions of this assessment are unambiguously summarised and fully justify identification of WBR007 & WBR008 as a proposed allocation.
  - c. Both sites scored poor in Stage 2a of the Sustainability Appraisal due to distances from services and facilities: Shropshire Council considers the conclusions of Stage 2a of the site assessment process were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.
  - d. The road adjacent to the site floods regularly and becomes impassible by car: Shropshire Council considers a robust and proportionate site assessment process has been undertaken, which has taken account of flood risk.
- 1.15. In conclusion, Shropshire Council considers that WBR007 & WBR008 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. WBR007 & WBR008 is proposed to be allocated for residential development. This site is some 1.27ha in size and the approximate site provision figure is around 25 dwellings.

- 2.2. Detailed development guidelines within Schedule S2.2(i) of draft Policy S2.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S2.2(i) of draft Policy S2.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WBR007 & WBR008.
- 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. A Planning Application (23/02100/OUT) was submitted for development of part of the site (WBR007) and subsequently refused in July 2023. Reasons for refusal related to proposals being contrary to the adopted Development Plan and insufficient information on heritage matters.
- 4.2. Shropshire Council does not consider that these matters are fundamental and can be addressed. As such, the site remains suitable for allocation within the draft Shropshire Local Plan.

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

**Shropshire Council Response:**

- 5.1. WBR007 & WBR008 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 WBR007 & WBR008 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 Worthen and Brockton and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Potential to improve pedestrian and cycle access to local services and amenities, including integration of a pedestrian route through the site and retention of the Public Right of way.
  - b. Potential to extend 30mph speed limit and introduce traffic calming measures onto the B4386.
  - c. Potential to retain and convert existing heritage assets at Bank Farm.
  - d. Ability to provide remediation of any contaminated land and provide buffers to adjacent slurry lagoons.
  - e. Ability to provide green infrastructure.
- 5.5. More generally, it is also considered that development of WBR007 & WBR008 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 WBR007 & WBR008 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 WBR007 & WBR008.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WBR007 & WBR008 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 WBR007 & WBR008 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. The site falls within an area where development has potential to impact the Stiperstones & The Hollies SAC through increased recreational pressures. Draft Settlement Policy S2.2 (supported by draft Policies DP12, DP14 and DP15) recognises 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. The site contains traditional farm buildings associated with historic farmstead of Bank Farm (HER PRN 22086) and is in proximity of other heritage assets. Site guidelines require Bank Farm farmstead and other historic farm buildings should be retained and sensitively converted. A Heritage Assessment should be undertaken, and any appropriate mitigation measures implemented. Draft Policy DP23 provides specific requirements for the conservation and enhancement of heritage assets.
  - c. There is a possibility of contaminated land on the site. Site guidelines require any contaminated land to be remediated. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage land contamination concerns.

- d. The site contains mature trees and hedgerows. Site guidelines require mature trees and hedgerows on the site to be retained.
- e. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- f. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this also applies to much of the land around Worthen & Brockton – and all promoted sites. This has been appropriately considered within the site assessment.
- g. The site has medium-high landscape and visual sensitivity. This has been appropriately considered within the site assessment process.
- h. The whole of the site allocation is located within a mineral safeguarding area. This has been appropriately considered within the site assessment process.

**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 WBR007 & WBR008.
- 7.4. With specific regard to flood risk at WBR007 & WBR008, in summary:
  - a. With regard to fluvial flood risk, proposed allocation WBR007 & WBR008 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 0% of proposed allocation WBR007 & WBR008 is located within the 30 and 100 year surface flood risk zones and around 2% of proposed allocation WBR007 & WBR008 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for WBR007 & WBR008 within Schedule S1.1(i) of draft Policy S1.1 address this issue, stating "*The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.*"
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WBR007 & WBR008. It concluded that the site WBR007 & WBR008 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 WBR007 & WBR008 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 WBR007 & WBR008.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WBR007 & WBR008 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 WBR007 & WBR008 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment

process and address key infrastructure requirements and the mechanisms to address identified constraints.

- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Enhanced pedestrian and cycle links to local services and amenities in the village, including integration of a pedestrian route through the site and retention of the Public Right of way.
  - b. Extension of the 30mph speed limit for the village and other traffic calming measures on the B4386.
  - c. Buffers to adjacent slurry lagoons.
  - d. Retention of mature trees and hedgerows and provision of green infrastructure on the site.
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WBR007 & WBR008. 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 WBR007 & WBR008 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 WBR007 & WBR008 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2029/30. The Council anticipates that development will progress at a rate of up to 15 dwellings a year. 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 WBR007 & WBR008 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 WBR007 & WBR008.

- 11.3. The boundary for WBR007 & WBR008 is defined by agricultural field boundaries to the north and east; property curtilages to the west and residential curtilages and the B4386 to the south.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WBR007 & WBR008 within Schedule S2.2(i) of draft Policy S2.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WBR007 & WBR008; 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 WBR007 & WBR008.
- 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 WBR007 & WBR008– 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 WBR007 & WBR008.

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 WBR007 & WBR008, 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 included objection to specific site guidelines proposed for WBR007 & WBR008. These are summarised in SD014.01 and GC4o.

12.9. Main objections included that the identified capacity of the site (25 dwellings) will be exceeded, leading to an excessive increase to the level of housing in the village. Shropshire Council considers the approximate site provision figure is appropriate and has been informed by a proportionate and robust site assessment process – it responds to consideration of the site's constraints, opportunities, and countryside character; as well as the rural nature of Worthen itself.

## **Questions: Site Allocation WBR010 – Land south of the B4386, Worthen**

**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 would form part of the Worthen & Brockton Community Hub. The site itself lies to the south-west of Worthen. The site consists of the entirety of one agricultural field and part of another larger agricultural field.
- 1.2. Site boundaries are formed by the B4386 to the north, residential property curtilages to the east and west, and residential property curtilages and the extent of the proposed allocation to the south.
- 1.3. To inform the identification of proposed site allocations, including WBR010, 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 C (SD006.04) 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 Bishops Castle 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 13 sites were considered for Worthen and Brockton. Within Stage 3 of the site assessment process, around 10 sites were considered for Worthen and Brockton.
- 1.12. WBR010 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and

WBR010 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of WBR010 as a proposed allocation. These objections included:
- a. The site would have a negative impact on views to/from the Shropshire Hills National Landscape. Shropshire Council considers a robust and proportionate site assessment process has been undertaken, which has taken account of landscape and visual sensitivity.
  - b. Cumulative impact of proposals mean this does not constitute sustainable development. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken. The process and conclusions of this assessment are unambiguously summarised and fully justify identification of WBR010 as a proposed allocation.
  - c. A safe pedestrian and vehicular access/links to the site cannot be achieved. Shropshire Council considers a robust and proportionate site assessment process has been undertaken, which included analysis by Highway Officers. The process and conclusions of this assessment are unambiguously summarised and fully justify identification of WBR010 as a proposed allocation.
  - d. Development has previously been refused on the site due to urbanising influences on the countryside. Shropshire Council considers a robust and proportionate site assessment process has been undertaken, which has taken account of landscape and visual sensitivity.
- 1.15. In conclusion, Shropshire Council considers that WBR010 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. WBR010 is proposed to be allocated for residential development. This site is some 2.24ha in size and the approximate site provision figure is around 20 dwellings.

- 2.2. Detailed development guidelines within Schedule S2.2(i) of draft Policy S2.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S2.2(i) of draft Policy S2.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WBR010.
- 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 applications have yet been received for proposed allocation WBR010.

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

**Shropshire Council Response:**

- 5.1. WBR010 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 WBR010 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 Worthen & Brockton and Shropshire.

- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Providing a substantial pedestrian footway along its road frontage and an appropriate crossing of the B4386 linking this footway to that to the north of the road.
  - b. Providing traffic calming of the B4386.
  - c. Ability to provide green infrastructure and open space – including existing trees and hedgerows and along site boundaries.
- 5.5. More generally, it is also considered that development of WBR010 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.
- 5.6. Shropshire Council would note that responses to the Post Stage 1 Interim Findings Consultation, included significant support for proposed allocation WBR010.

**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 WBR010 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 WBR010.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WBR010 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 WBR010 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process



and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The site falls within an area where development has potential to impact the Stiperstones & The Hollies SAC through increased recreational pressures. Draft Settlement Policy S2.2 (supported by draft Policies DP12, DP14 and DP15) recognises 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. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this also applies to much of the land around Worthen & Brockton – and all promoted sites. This has been appropriately considered within the site assessment.
  - c. The site has medium-high visual sensitivity. This has been appropriately considered within the site assessment process.
  - d. The site contains mature trees and hedgerows. Site guidelines require mature trees and hedgerows on the site to be retained and appropriately buffered.

**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 WBR010.

- 7.4. With specific regard to flood risk at WBR010, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, none of proposed site is located within the 30, 100 or 1,000 year surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WBR010. It concluded that the site WBR010 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WBR010 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 WBR010.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WBR010 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 WBR010 within Schedule S2.2(i) of draft Policy S2.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure

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

- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site.
  - b. Providing traffic calming of the B4386.
  - c. Providing a substantial pedestrian footway along its road frontage and an appropriate crossing of the B4386 linking this footway to that to the north of the road.
  - d. Providing green infrastructure and open space – including existing trees and hedgerows and along site boundaries.
- 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 WBR010. 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 WBR010 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 WBR010 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 2030/31 and continue until 2031/32. The Council also anticipates that development will progress at a rate of 10 dwellings per annum.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation WBR010 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 WBR010.
- 11.3. The boundary for WBR010 is defined by the B4386 to the north, residential property curtilages to the east and west, and residential property curtilages and the extent of the proposed allocation to the south.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WBR010 within Schedule S2.2(i) of draft Policy S2.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WBR010; 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 WBR010.
- 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 WBR010 – 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 WBR010.
- 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 WBR010, 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 included objection to specific site guidelines proposed for WBR010. These are summarised in SD014.01 and GC4o.

12.9. Main objections included that the identified capacity of the site (20 dwellings) will be exceeded, leading to an excessive increase to the level of housing in the village. Shropshire Council considers the approximate site provision figure is appropriate and has been informed by a proportionate and robust site assessment process – it responds to consideration of the site’s constraints, opportunities, and countryside character; as well as the rural nature of Worthen itself.