

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 26**



## **Matter 26 - All Employment Allocations**

***Issue: Whether the proposed are justified, effective and consistent with national planning policy.***

**Questions: Site Allocation P58a – Land north of Stanmore Industrial Estate – see MM082**

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

### **Shropshire Council Response:**

- 1.1. P58a is a proposed employment land allocation for 6.8 hectares to extend the existing Stanmore Industrial Estate located to the east of Bridgnorth. The employment development will extend the good quality, campus style development of the existing employment area primarily for Class B uses.
- 1.2. P58a is located to the east of Stanmore Industrial Estate and comprises an area of land with trees and an agricultural field in the Green Belt around the curtilage of the Estate. The western and southern boundary comprise the edge of the curtilage of the Estate. On the eastern side of the extension land, the boundary extends around the agricultural field to the lane serving The Hobbins. This boundary then returns to capture the treed land and enclose it within the line of a rear Estate road which extends into the Green Belt land.
- 1.3. Situated in the Green Belt to the east of Bridgnorth, the development will take full account of the need to enclose both the built form of the development and any infrastructure works to separate the extension of the Estate from the Green Belt.
- 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 are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 8 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Bridgnorth is summarised within SD006.05.

- 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 was a screening exercise which considered the availability; size and strategic suitability of the site. 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 those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where uncertainty remained 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 were considered to show the site was unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where 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 (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), 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

Bridgnorth 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 the planning application register, and consideration of land owned by the public sector.

- 1.11. Within Stages 2a and 2b of the site assessment process, around 50 sites were considered at Bridgnorth. Within Stage 3 of the site assessment process, around 35 sites were considered at Bridgnorth.
- 1.12. P58a was proactively promoted for employment development during the plan-making process and ultimately identified as a proposed employment 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 P58a was identified as a proposed employment 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 P58a as a proposed allocation.
- 1.15. These objections are summarised in SD014.01 and GC4o and included representations suggesting the removal of employment allocation P58a from the Plan to protect the land as part of the countryside at Stanmore which forms part of the Shropshire Green Belt. Representations suggest that P58a is inappropriate / unnecessary because:
  - a. Lack of need/demand for employment land and lack of certainty that if allocated it would be developed.
  - b. Existing/proposed alternative employment sites available that are not in the Green Belt (some suggested inclusion of STC002 and P58a may undermine their viability, including the employment proposed at BRD030, others suggested capacity remained within the existing Stanmore Industrial Estate so STC002 and P58a are not needed).
  - c. Changes to the wider strategy for Bridgnorth, resulting in no residential development in the Stanmore area, have not been consistently reflected in relation to these sites.
  - d. The separation from Bridgnorth and the rural location of these sites, its expansion will exacerbate existing issues.
  - e. Impact on Green Belt (the Green Belt Assessment and Review under-estimate the contribution these sites make to the Green Belt) and open countryside. Conflict with associated policies.

- f. Lack of evidence and exceptional circumstances to justify the release of the sites from the Green Belt (no reference is made to existing demand, capacity and occupancy rates at Stanmore Industrial Estate).
  - g. Site constraints such as loss of agricultural land (which has not been sufficiently assessed).
  - h. Concerned P58A will accommodate waste management facilities.
- 1.16. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation included support and objection to the site assessment process which identified P58a as an appropriate location for housing development. These responses are summarised in GC52 and These objections are summarised in SD014.01 and GC40 and included representations suggesting the removal of employment allocation P58a from the Plan because:
- a. This proposal is not consistent with national policy, not effective (cannot be guaranteed to be delivered within the Plan period), and not justified (not based on appropriate robust evidence or consideration of alternatives).
  - b. There has not been proper consideration of alternative sites or demonstration of exceptional circumstances and consider further land for employment is not needed at Stanmore.
  - c. It was linked to previous proposals for housing in the area no longer carried forward, removing the need for them.
  - d. The existing site is not yet built-out and its development has slowed down (as have other sites in Bridgnorth including existing employment allocations).
  - e. There remains capacity at other employment locations in Bridgnorth.
  - f. It is no longer a centre of excellence for engineering and advanced manufacturing, the centre of excellence has relocated to Telford and Grainger and Warrall the main operator has halved their workforce and remain in difficulty.
  - g. Occupiers are now similar to any other employment site in Shropshire (list of occupiers attached to response).
  - h. Sites P58a and STC002, should be deleted from Plan and the land should remain as Green Belt.
- 1.17. Shropshire Council considers the proposals for P58a constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

- 2.1. P58a is proposed to be allocated for employment development. This site comprises 6.8ha of greenfield land situated in the Green Belt to the east of Bridgnorth which is designated as a Principal Centre.
- 2.2. Detailed development guidelines within Schedule S3.1(ii) of draft Policy S3.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site.
- 2.3. The specific employment generating uses on the site would be particularly influenced by draft Policies SP1; SP2; SP13 and SP14.
- 2.4. The development guidelines indicate the site is proposed to be principally for development within primary employment use classes B2, B8, E(g) and appropriate sui generis uses. It will be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S3.1(ii) of draft Policy S3.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of P58a.
- 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. This site is currently the subject of discussions between the Council and the site promoter about specific details for the development

with a view to submitting an application on the adoption of the Local Plan.

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

**Shropshire Council Response:**

- 5.1 P58a is a proposed employment land allocation for 6.8 hectares to extend the existing Stanmore Industrial Estate located to the east of Bridgnorth. The employment development will extend the good quality, campus style development of the existing employment area primarily for Class B uses.
- 5.2 P58a is located to the east of Stanmore Industrial Estate and comprises an area of land with trees and an agricultural field in the Green Belt around the curtilage of the Estate. The western and southern boundary comprise the edge of the curtilage of the Estate. On the eastern side of the extension land, the boundary extends around the agricultural field to the lane serving The Hobbins. This boundary then returns to capture the treed land and enclose it within the line of a rear Estate road which extends into the Green Belt land.
- 5.3 Situated in the Green Belt to the east of Bridgnorth, the development will take full account of the need to enclose both the built form of the development and any infrastructure works to separate the extension of the Estate from the Green Belt.
- 5.4 As such, key benefits of the proposed development include:
  - a. greenfield extension of a significant, existing employment area to improve the leased employment premises offer in Bridgnorth.
  - b. delivery of grow on space and inward investment opportunities to provide employment in Class B uses.
  - c. provision of modern floorspace in high quality, new commercial buildings on the high quality, campus at Stanmore Industrial Estate.
- 5.5 Shropshire Council considers that through the proposed policy framework, development of P58a would constitute sustainable development that contributes to the long-term sustainability of Bridgnorth and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of P58a and the wider draft policies in the draft Shropshire Local Plan.
- 5.6 The location of P58a, along with the proposed policy framework, will effectively ensure the development integrates with and complements the existing built form of Stanmore Industrial Estate.

The boundary treatment will also ensure the extension to the Estate forms a strong and permanent boundary to the Green Belt.

- 5.7 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines for P58a. These include:
- a. Development will be within primary use classes B2, B8 and appropriate sui generis uses targeted towards the engineering and advanced manufacturing sectors and complement the employment offer on the existing Industrial Estate.
  - b. Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise arising from the site.
  - c. Access will be provided via the existing Stanmore Industrial Estate through its junction and access road from the A454.
  - d. Necessary improvements will be made to highways infrastructure, including the access road to Stanmore Industrial Estate and its junction with the A454, the A454/A458 roundabout (east) and the A454/B4363 roundabout (west).
  - e. Development should seek to provide green infrastructure links through the site, retain high quality trees, woodland and priority habitats on the site. Any lost trees should be offset within the sites buffer.
  - f. Substantial and effective boundary treatments to the Estate will be required to create a buffer around the site.
  - g. An effective buffer to nearby residential properties at both ends of the Estate is particularly important for the amenity of neighbouring uses.
  - h. Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.
  - i. The buffer to the north should provide a positive link to nearby woodland.
  - j. The public right of way along part of the sites southern boundary will be retained.
  - k. 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.
  - l. Flood and water management measures must not displace water elsewhere.



- 5.8 More generally, it is also considered that development of P58a 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 P58a 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 P58a.
- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that P58a constituted an appropriate proposed mixed-use 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 P58a within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The Green Belt Assessment and Review undertaken for Shropshire indicates that P58a is located:
    - i. within a Green Belt parcel where the land performs weakly against purpose 2; moderately against purpose 3; with no contribution against purpose 4.
    - ii. where the release of the land would have a moderate level of harm on the Green Belt due to the level of encroachment on countryside within the parcel
    - iii. No sub- parcels were identified which would have less harm.
    - iv. Site guidelines require the following:
      - Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.
      - Substantial and effective boundary treatments to the Estate are required to create a buffer around the site.

- Provide a puffer to the north to provide a positive link to nearby woodland.
  - Retain the public right of way along part of the southern boundary.
- b. P58a has good vehicular access onto A454 and should be designed to promote cycling and walking for local trips to maximise sustainable travel. Site guidelines require access from the existing Stanmore Industrial Estate through its junction and access road from the A454.
  - c. Protect the amenity of any adjoining residential uses from any impacts from the commercial development of P58a. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise arising from the site. An effective buffer to nearby residential properties at both ends of the Estate is particularly important for the amenity of neighbouring uses.
  - d. In the context of employment development, P58a is deemed to have medium and high landscape and visual sensitivity. Site guidelines require substantial and effective boundary treatments to the Estate to create a buffer around the site.
  - e. There is no known archaeological interest on P58a but this site should be investigated for archaeological potential. Site guidelines should be modified to incorporate this requirement and supplement the policy provisions in the Plan.
  - f. P58a lies within an environmental network corridor which should be maintained and enhanced. The enclosure of the site requires a detailed landscape assessment to include enhancement of environmental network by providing green links along northern boundary linking to Stanmore Country Park. Consider centralised open space to provide biodiversity enhancements. Site guidelines require the buffer to the north to provide a positive link to nearby woodland and public right of way along part of the sites southern boundary to be retained.
  - g. Retain fine trees and woodland within the site as features within the open space on the site and link with link with existing woodland adjacent to the site. Site guidelines require the development provide green infrastructure links through the site, retain high quality trees, woodland and priority habitats on the site. Any lost trees should be offset within the sites buffer.
  - h. P58a is in the surface water flood risk zones for severe conditions and lies over a Source Protection Zone. Site guidelines require an appropriate sustainable drainage system, 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.

- i. P58a is located within a mineral safeguarding area. This has been appropriately considered within the site assessment process.
- j. Applying the precautionary principle, P58a consists of best and most versatile agricultural land. 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 which informs 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) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation P58a provides further information on the site assessment process.
- 7.4. In summary, the flood risk at P58a recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. The flood risk recognises:
  - a. Around 1% of P58a lies within the 100 year surface flood risk zones.
  - b. Around 9% of P58a lies within the 1,000 year surface flood risk zone which would limit development on the site to 91% of the land area.
- 7.5. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths. These measures would manage surface water flood risks during severe conditions.
- 7.6. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded

proposed allocation P58a passed the sequential test and the exception test was not required.

- 7.7. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for P58a within Schedule S3.1(ii) of Draft Policy S3.1 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.*"

**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 P58a 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 P58a.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that P58a constituted an appropriate proposed employment allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for P58a within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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. Access will be provided via the existing Stanmore Industrial Estate through its junction and access road from the A454.
  - b. Necessary improvements will be made to highways infrastructure, including the access road to Stanmore Industrial Estate and its junction with the A454, the A454/A458 roundabout (east) and the A454/B4363 roundabout (west).
  - c. Development should seek to provide green infrastructure links through the site, retain high quality trees, woodland and priority habitats on the site. Any lost trees should be offset within the sites buffer.
  - d. Substantial and effective boundary treatments to the Estate will be required to create a buffer around the site.
  - e. An effective buffer to nearby residential properties at both ends of the Estate is particularly important for the amenity of neighbouring uses.
  - f. Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.
  - g. The buffer to the north should provide a positive link to nearby woodland.
  - h. 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.
- 8.6 The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of P58a. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.7 Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.8 Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.

- c. Policies DP12 – DP24 which address the natural and historic environment.
- d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

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

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site P58a is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of P58a stated *"Rents for new lettings are currently in a range between £6.00 -£8.50 per square foot and at this level, and with the available land standing in at low values, with services already provided, there is no doubt that new development will be viable. Stanmore Properties is in a very strong financial position and has funds available to construct new buildings."*

**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 P58a 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 2024/25 and continue until 2029/30. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of P58a stated *"Rents for new lettings are currently in a range between £6.00 -£8.50 per square foot and at this level, and with the available land standing in at low values, with services already provided, there is no doubt that new development will be*

*viable. Stanmore Properties is in a very strong financial position and has funds available to construct new buildings." P58a is therefore expected to be delivered earlier in this timescale on the adoption of the Local Plan.*

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation P58a 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 P58a.
- 11.3. P58a is located to the east of Stanmore Industrial Estate and comprises an area of land with trees and an agricultural field in the Green Belt around the curtilage of the Estate. The western and southern boundary comprise the edge of the curtilage of the Estate. On the eastern side of the extension land, the boundary extends around the agricultural field to the lane serving The Hobbins. This boundary then returns to capture the treed land and enclose it within the line of a rear Estate road which extends into the Green Belt land.

**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 P58a within Schedule S3.1(i) of draft Policy S3.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of P58a; 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 P58a.

- 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 P58a – 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 P58a.
- 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 P58a, 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 P58a. These are summarised in



SD014.01 and GC4o. Representations on the site guidelines for P58a suggest:

- a. Site guidelines regarding types of future employment uses need to be updated to add in business use class E(g)(i) offices, (ii) research and development, and (iii) light industrial.
- b. Broader range of uses are essential allow the site to reach its potential and provide flexibility (particularly important given Covid 19).
- c. Furthermore, these uses are already represented on Stanmore Industrial Estate and complement advanced manufacturing uses.
- d. Sites are located on a principal aquifer and in source protection zone 3.
- e. Contaminated land and surface water management will need to be considered.
- f. Welcome site guideline specifying employment development should be targeted towards engineering and advanced manufacturing sectors, to complement the employment offer on the existing Industrial Estate.

12.9 Shropshire Council considers the proposals for P58a constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

### **Questions: Site Allocation STC002 – Land adjacent to Hickman Road, Stanmore Industrial Estate – see MM083**

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

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

- 1.1. STC002 is a proposed employment land allocation for 6.8 hectares to extend the existing Stanmore Industrial Estate located to the east of Bridgnorth. The employment development will extend the good quality, campus style development of the existing employment area primarily for Class B uses.
- 1.2. STC002 is located to the east of Stanmore Industrial Estate and comprises an area of land with trees and an agricultural field in the Green Belt around the curtilage of the Estate. The western and southern boundary comprise the edge of the curtilage of the Estate. On the eastern side of the extension land, the boundary extends around the agricultural field to the lane serving The Hobbins. This boundary then returns to capture the treed land and enclose it within the line of a rear estate road which extends into the Green Belt land.

- 1.3. Situated in the Green Belt to the east of Bridgnorth, the development will take full account of the need to enclose both the built form of the development and any infrastructure works to separate the extension of the Estate from the Green Belt.
- 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 are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 8 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Bridgnorth is summarised within SD006.05.
- 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 was a screening exercise which considered the availability; size and strategic suitability of the site. 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 those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where uncertainty remained 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 were considered to show the site was unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where 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 (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), 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 Bridgnorth 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 the planning application register, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 50 sites were considered at Bridgnorth. Within Stage 3 of the site assessment process, around 35 sites were considered at Bridgnorth.
- 1.12. STC002 was proactively promoted for employment development during the plan-making process and ultimately identified as a proposed employment 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 STC002 was identified as a proposed employment 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 STC002 as a proposed allocation.
- 1.15. These objections are summarised in SD014.01 and GC4o and included representations suggesting the removal of employment allocation STC002 from the Plan to protect the land as part of the countryside at Stanmore which forms part of the Shropshire Green

Belt. Representations suggest that STC002 is inappropriate / unnecessary because:

- a. Lack of need/demand for employment land and lack of certainty that if allocated it would be developed.
- b. Existing/proposed alternative employment sites available that are not in the Green Belt (some suggested inclusion of STC002 and P58a may undermine their viability, including the employment proposed at BRD030, others suggested capacity remained within the existing Stanmore Industrial Estate so STC002 and P58a are not needed).
- c. Changes to the wider strategy for Bridgnorth, resulting in no residential development in the Stanmore area, have not been consistently reflected in relation to these sites.
- d. The separation from Bridgnorth and the rural location of these sites, its expansion will exacerbate existing issues.
- e. Impact on Green Belt (the Green Belt Assessment and Review under-estimate the contribution these sites make to the Green Belt) and open countryside. Conflict with associated policies.
- f. Lack of evidence and exceptional circumstances to justify the release of the sites from the Green Belt (no reference is made to existing demand, capacity and occupancy rates at Stanmore Industrial Estate).
- g. Site constraints such as loss of agricultural land (which has not been sufficiently assessed).
- h. Concerned STC002 will accommodate waste management facilities.

1.16. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation included support and objection to the site assessment process which identified STC002 as an appropriate location for housing development. These responses are summarised in GC52 and These objections are summarised in SD014.01 and GC4o and included representations suggesting the removal of employment allocation STC002 from the Plan because:

- a. This proposal is not consistent with national policy, not effective (cannot be guaranteed to be delivered within the Plan period), and not justified (not based on appropriate robust evidence or consideration of alternatives).
- b. There has not been proper consideration of alternative sites or demonstration of exceptional circumstances and consider further land for employment is not needed at Stanmore.
- c. It was linked to previous proposals for housing in the area no longer carried forward, removing the need for them.

- d. The existing site is not yet built-out and its development has slowed down (as have other sites in Bridgnorth including existing employment allocations).
  - e. There remains capacity at other employment locations in Bridgnorth.
  - f. It is no longer a centre of excellence for engineering and advanced manufacturing, the centre of excellence has relocated to Telford and Grainger and Warrall the main operator has halved their workforce and remain in difficulty.
  - g. Occupiers are now similar to any other employment site in Shropshire (list of occupiers attached to response).
  - h. Sites P58a and STC002, should be deleted from Plan and the land should remain as Green Belt.
- 1.17. Shropshire Council considers the proposals for STC002 constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

- 2.1. STC002 is proposed to be allocated for employment development. This site comprises 4.6ha of greenfield land situated in the Green Belt to the east of Bridgnorth which is designated as a Principal Centre.
- 2.2. Detailed development guidelines within Schedule S3.1(ii) of draft Policy S3.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site. The specific employment generating uses on the site would be particularly influenced by draft Policies SP1; SP2; SP13 and SP14.
- 2.3. The development guidelines indicate the site is proposed to be principally for development within primary use classes B2, B8, E(g) and appropriate sui generis uses. It will be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S3.1(ii) of draft Policy S3.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of STC002.
- 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. STC002 is currently the subject of discussions between the Council and the site promoter about specific details for the development with a view to submitting an application on the adoption of the Local Plan. This site has a planning history which pre-dates Shropshire Council which did not provide sufficient justification to develop this Green Belt land.

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

**Shropshire Council Response:**

- 5.1 STC002 is a proposed employment land allocation for 4.6 hectares to extend the existing Stanmore Industrial Estate located to the east of Bridgnorth. The employment development will extend the good quality, campus style development of the existing employment area primarily for Class B uses.
- 5.2 Situated in the Green Belt to the east of Bridgnorth, the development will take full account of the need to enclose both the built form of the development and any infrastructure works to separate the extension of the Estate from the Green Belt.
- 5.3 As such, key benefits of the proposed development include:
  - a. greenfield extension of a significant, existing employment area to improve the leased employment premises offer in Bridgnorth.

- b. delivery of grow on space and inward investment opportunities to provide employment in Class B uses.
  - c. provision of modern floorspace in high quality, new commercial buildings on the high quality, campus at Stanmore Industrial Estate.
- 5.4 Shropshire Council considers that through the proposed policy framework, development of STC002 would constitute sustainable development that contributes to the long-term sustainability of Bridgnorth and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of STC002 and the wider draft policies in the draft Shropshire Local Plan.
- 5.5 The location of STC002, along with the proposed policy framework, will effectively ensure the development integrates with and complements the existing built form of Stanmore Industrial Estate. The boundary treatment will also ensure the extension to the Estate forms a strong and permanent boundary to the Green Belt.
- 5.6 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines for STC002. These include:
- a. Development will be within primary use classes B2, B8 and appropriate sui generis uses targeted towards the engineering and advanced manufacturing sectors and complement the employment offer on the existing Industrial Estate.
  - b. Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise arising from the site.
  - c. Development should seek to provide green infrastructure links through the site, retain high quality trees and retain priority habitats on the site. Any lost trees should be offset within the sites buffer.
  - d. Site design and layout will positively respond to the site's relationship with Stanmore Country Park and The Hobbins.
  - e. An effective buffer to The Hobbins and other residential properties is particularly important for the amenity of neighbouring uses.
  - f. Access will be provided via the existing Stanmore Industrial Estate through its junction and access road from the A454.
  - g. Necessary improvements will be made to highways infrastructure, including the access road to Stanmore Industrial Estate and its junction with the A454, the A454/A458 roundabout (east) and the A454/B4363 roundabout (west).

- h. Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.
  - i. Substantial and effective boundary treatments to the site will be required to create and maintain the buffer to the Green Belt around the site.
- 5.7 More generally, it is also considered that development of STC002 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 STC002 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 STC002.
- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that STC002 constituted an appropriate proposed mixed-use 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 STC002 within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The Green Belt Assessment and Review undertaken for Shropshire indicates that STC002 is located:
    - i. Within a Green Belt parcel where the land performs weakly against purpose 2; strongly against purpose 3; with no contribution against purpose 4.
    - ii. Where the release of the land would have a moderate level of harm on the Green Belt due to some encroachment on countryside within the parcel.
    - iii. No sub- parcels were identified which would have less harm.



- iv. Site guidelines require the following:
- Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.
  - Site design and layout will positively respond to the site's relationship with Stanmore Country Park.
  - Substantial and effective boundary treatments to the Estate are required to create a buffer around the site.
- b. STC002 has good vehicular access onto A454 but may require an upgrade to the A454 junction and review of speed limits. Site guidelines require access from the existing Stanmore Industrial Estate through its junction and access road from the A454. Necessary improvements will be made to highways infrastructure, including the access road to Stanmore Industrial Estate and its junction with the A454, the A454/A458 roundabout (east) and the A454/B4363 roundabout (west).
- c. Protect the amenity of any adjoining residential uses from any impacts from the commercial development of STC002. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise arising from the site. Site design and layout will positively respond to the site's relationship with The Hobbins.
- d. An effective buffer to nearby residential properties is particularly important for the amenity of neighbouring uses. Site guidelines require an effective buffer to The Hobbins and other residential properties is particularly important for the amenity of neighbouring uses.
- e. In the context of employment development, STC002 is deemed to have medium landscape and visual sensitivity. Site guidelines substantial and effective boundary treatments to the Estate are required to create a buffer around the site.
- f. Site formally part of RAF Bridgnorth (HER PRN 29127) and formerly included part of Bridgnorth racecourse (HER PRN 32056) and should be investigated for archaeological potential. Site guidelines should be modified to incorporate this requirement and supplement the policy provisions in the Plan.
- g. STC002 lies within an environmental network corridor which should be maintained and enhanced. Site guidelines require the development to provide green infrastructure links through the site, retain high quality trees and retain priority habitats on the site. Any lost trees should be offset within the sites buffer.
- h. Retain and enhance trees and hedgerows within the site as features and habitat within the open space on the site and link with existing woodland to east, south and west to provide biodiversity enhancements. Site guidelines require the

development to provide green infrastructure links through the site, retain high quality trees, woodland and priority habitats on the site. Any lost trees should be offset within the sites buffer.

- i. STC002 is located within a mineral safeguarding area. This has been appropriately considered within the site assessment process.
- j. Applying the precautionary principle, STC002 consists of best and most versatile agricultural land. 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 which informs 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) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation STC002 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at STC002 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, the lowest risk of flooding. The flood risk recognises:
  - a. Around 1% of STC002 lies within the 30 year and 100 year surface flood risk zones.
  - b. Around 6% of STC002 lies within the 1,000 year surface flood risk zone which would limit development on the site to 94% of the land area. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths. These measures would manage surface water flood risks during severe conditions.
- 7.5. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded

proposed allocation STC002 passed the sequential test and the exception test was not required.

- 7.6. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application.

**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 STC002 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 STC002.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that STC002 constituted an appropriate proposed employment allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for STC002 within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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. Development should seek to provide green infrastructure links through the site, retain high quality trees and retain priority habitats on the site. Any lost trees should be offset within the sites buffer.
  - b. Access will be provided via the existing Stanmore Industrial Estate through its junction and access road from the A454.

- c. Necessary improvements will be made to highways infrastructure, including the access road to Stanmore Industrial Estate and its junction with the A454, the A454/A458 roundabout (east) and the A454/B4363 roundabout (west).
  - d. Compensatory provision to the Green Belt will be made through investment in the quality of Stanmore Country Park.
- 8.6 The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of STC002. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.7 Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.8 Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

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

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site STC002 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of STC002 stated *"Rents for new lettings are currently in a range between £6.00 - £8.50 per*

*square foot and at this level, and with the available land standing in at low values, with services already provided, there is no doubt that new development will be viable. Stanmore Properties is in a very strong financial position and has funds available to construct new buildings."*

**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 STC002 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 2024/25 and continue until 2029/30. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of STC002 stated *"Rents for new lettings are currently in a range between £6.00 - £8.50 per square foot and at this level, and with the available land standing in at low values, with services already provided, there is no doubt that new development will be viable. Stanmore Properties is in a very strong financial position and has funds available to construct new buildings."* STC002 is therefore expected to be delivered earlier in this timescale on the adoption of the Local Plan.

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation STC002 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 STC002.

11.3. STC002 is located to the north of Stanmore Industrial Estate and comprises an area of open land in the Green Belt surrounding a single plot extension on the existing Estate, The southern boundary comprises the edge of the curtilage of the Estate formed by the single plot extension. On the western and eastern boundaries the land adjoins the Stanmore Country Park (west) and a wooded residential curtilage (east). To the north the boundary lies along lane serving The Hobbins.

**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 STC002 within Schedule S3.1(i) of draft Policy S3.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of STC002; 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 STC002.
- 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 STC002 – 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 STC002.

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 STC002, 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 STC002. These are summarised in SD014.01 and GC4o. Representations on the site guidelines for STC002 suggest:

- a. Site guidelines regarding types of future employment uses need to be updated to add in business use class E(g)(i) offices, (ii) research and development, and (iii) light industrial.
- b. Broader range of uses are essential allow the site to reach its potential and provide flexibility (particularly important given Covid 19).
- c. Furthermore, these uses are already represented on Stanmore Industrial Estate and complement advanced manufacturing uses.
- d. Sites are located on a principal aquifer and in source protection zone 3.
- e. Contaminated land and surface water management will need to be considered.
- f. Welcome site guideline specifying employment development should be targeted towards engineering and advanced manufacturing sectors, to complement the employment offer on the existing Industrial Estate.

12.9 Shropshire Council considers the proposals for STC002 constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

**Questions: Site Allocation BRD030 – Tasley Garden Village, Bridgnorth – see MM081**

**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 mixed use housing and employment allocation lies to the south-west of Bridgnorth. It primarily consists of a series of agricultural fields and agricultural complexes. It is bounded by the A458, a residential curtilage and existing employment allocations (which benefit from Planning Permission) to the north; Ludlow Road and residential curtilages to the east; and primarily agricultural field boundaries to the south and west.
- 1.2. To inform the identification of proposed site allocations, the options to deliver housing and employment development in Bridgnorth including BRD030, were considered by the Council in 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 are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 4 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Bridgnorth is summarised within ED013.01.
- 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 was a screening exercise which considered the availability; size and strategic suitability of the site. 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 those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.

- b. *Availability*: Sites were 'filtered out' of the site assessment process where uncertainty remained 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 were considered to show the site was unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where 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 (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), 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. For the avoidance of doubt, the stage 3 site assessment process included consideration of whether a site is located within the Green Belt. Where it was located in the Green Belt, the assessment considered the harm that would result from releasing the site from the Green Belt, alternative development options and whether exceptional circumstances existed.
- 1.10. To inform the identification of sites to accommodate proposed contributions to the Black Country, a similar site assessment process was undertaken. This identified and considered the geography within which reasonable options to accommodate these contributions would be located. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.

- 1.11. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bridgnorth 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 the planning application register, and consideration of land owned by the public sector.
- 1.12. Within Stages 2a and 2b of the site assessment process, around 50 sites were considered at Bridgnorth. Within Stage 3 of the site assessment process, around 35 sites were considered at Bridgnorth.
- 1.13. BRD030 was proactively promoted for residential development during the plan-making process and ultimately identified as a proposed mixed housing and employment allocation through the site assessment process.
- 1.14. 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 BRD030 was identified as a proposed mixed housing and employment allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15. Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter, which provide further information in support of this site.
- 1.16. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of BRD030 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
  - a. The site is unsustainable, unavailable (in multiple ownerships), undeliverable and unviable. Shropshire Council considers that the site is available and that sustainable development of it is both viable and achievable. SoCG07 and SoCG07a provide further certainty on these matters.
  - b. The site is subject to one or more constraints, including the ability to form an appropriate access, separation from existing built form caused by the A458, lack of links to the existing built form of Bridgnorth, landscape and visual sensitivity, loss of high-quality agricultural land, heritage and ecological impacts, noise and odour impacts, and mineral sterilisation. Shropshire Council considers the site assessment process included appropriate consideration of all potential constraints to development of the site. This site assessment process fully justifies the identification of BRD030 as a proposed allocation.

- c. Infrastructure capacity impacts the suitability and constrains the ability to develop the site. Such constraints include drainage; highways; public transport, park and ride, and active travel links (particular over the A458); broadband; and community facilities. Shropshire Council considers the site assessment process included appropriate consideration of potential infrastructure constraints and requirements associated with any development of the site. This site assessment process fully justifies the identification of BRD030 as a proposed allocation. SoCG07 and SoCG07a provide further certainty on these matters.
- d. The site is too large and there is a lack of need/demand for this level of housing and employment. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies identification of BRD030 as a proposed employment allocation providing an extensive, new employment area located on the strategic corridor of the A458 in the Principal Centre of Bridgnorth.
- e. The site would not represent a self-contained development and/or is separated from the existing community (particularly the town centre and existing employment). Shropshire Council considers site guidelines ensure any development of this site would ensure provision of on-site infrastructure to support the new and existing communities of Bridgnorth. This will ensure the site appropriately integrates into the existing built form and existing communities of Bridgnorth. These site guidelines have been informed by the site assessment process undertaken.
- f. The site would undermine the relocation of the livestock building. Shropshire Council considers the relationship between this proposed allocation and the existing allocation to support the relocation of the livestock market was appropriately considered through the site assessment process. The Council would note that Outline Planning Permission (21/05023/OUT) has recently been granted to relocate the livestock market as part of a wider development scheme.
- g. The site would have unacceptable cumulative impacts alongside saved SAMDev Plan allocations and wider development proposals across Shropshire. Shropshire Council considers the site assessment process included appropriate consideration of potential cumulative impacts of any development of this site and other development locations. This site assessment process fully justifies identification of BRD030 as a proposed allocation.
- h. The site performs poorly within Stage 2a of the Sustainability Appraisal of the draft Shropshire Local Plan and/or this assessment is incorrect. Shropshire Council considers Stage 2a of the site assessment process is proportionate and robust and that

conclusions reached were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.

- i. Lack of technical assessments to inform the proposed allocation. Particular assessments referenced included landscape and visual sensitivity, air quality, agricultural land, noise and odour. The site promoter prepared a number of technical assessments to inform their site promotion which received due consideration by the Council - SoCG07 and SoCG07a provide further information on these matters. Crucially, Shropshire Council considers the draft Shropshire Local Plan is underpinned by a proportionate and robust evidence base, which informed the site assessment process undertaken. This site assessment process was also informed by analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers. This site assessment process fully justifies the identification of BRD030 as a proposed allocation.
- j. Lack of consideration of alternative sites. Shropshire Council considers the site assessment process undertaken gives due consideration to all alternative sites at Bridgnorth. The assessment process undertaken is unambiguously summarised and the conclusions reached have been explained. This site assessment process fully justifies the identification of BRD030 as a proposed allocation. The Council would note, a distinction should be made between a lack of consideration of alternative sites and disagreement over the outcomes of this process.

1.17. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation also included support and objection to the site assessment process which identified BRD030 as an appropriate location to accommodate part of the proposed contribution to the unmet housing need forecast to arise in the Black Country. These responses are summarised in GC52.

1.18. Reasons for objections were often similar to those addressed in paragraph 1.16 of this response. Other reasons for objections included:

- a. The site was proposed for allocation to meet the needs arising in Bridgnorth and Shropshire as a whole, not the Black Country. To accommodate contributions to the Black Country on the site effectively reduces their contribution to addressing Shropshire's housing needs.
  - i. Shropshire Council considers the identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process which unambiguously documents the assessment process undertaken and explains the conclusions reached.

This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.

- ii. Shropshire Council would note the submission version of the draft Shropshire Local Plan included a proposed contribution of 1,500 dwellings towards the unmet housing needs, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.
  - iii. Shropshire Council would also note that as a proposed Principal Centre, Bridgnorth is intended to contribute towards strategic growth objectives in the east of the County. As such, it is considered entirely appropriate for the settlement to accommodate part of the proposed contribution to the Black Country.
- b. There is a lack of justification for proposals to accommodate part of the housing contribution to the Black Country on BRD030. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process which unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
- c. Alternative sites are available that are more appropriate or have not been appropriately considered. Shropshire Council considers the site assessment process undertaken to inform identification of sites to accommodate proposed contributions to the Black Country considered all other reasonable site options. The assessment process undertaken has been unambiguously summarised and the conclusions reached have been explained. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country. The Council would note, a distinction should be made between a lack of consideration of alternative sites and disagreement about the outcomes of this process.
- d. The site location and its accessibility to the Black Country (including modes of transport and travel times) means the site is not suitable to accommodate proposed contributions to the Black Country.
- i. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process.

- ii. The assessment process included identification of an appropriate assessment geography, informed by a range of factors including geographic proximity, location and connectivity, migration and commuting patterns, and travel to work areas.
  - iii. The assessments unambiguously documents the process undertaken and explains the conclusions reached.
  - iv. The Council considers the site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
- e. Migration/commuting trends between Shropshire and the Black Country mean the site is not suitable to accommodate proposed contributions to the Black Country.
  - i. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process.
  - ii. The assessment process included identification of an appropriate assessment geography, informed by a range of factors including geographic proximity, location and connectivity, migration and commuting patterns, and travel to work areas.
  - iii. The assessments unambiguously documents the process undertaken and explains the conclusions reached.
  - iv. The Council considers the site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
- f. Increased impact of development of the site on Bridgnorth and other nearby settlements (particularly their infrastructure) means the site is unsuitable to accommodate part of the proposed contribution to the Black Country. Shropshire Council considers that the site assessment process included appropriate consideration of potential infrastructure constraints and requirements associated with any development of the site. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.

1.19. In conclusion, Shropshire Council considers that BRD030 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 4 of GC44.

1.20. Shropshire Council also considers that identification of BRD030 as a location to accommodate part of the proposed contribution to the unmet housing need forecast to arise in the Black Country was informed by a proportionate and robust site assessment process. This process considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This process and the conclusions reached are unambiguously summarised within Chapter 12 and Appendices 1-10 of GC44.

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

**Shropshire Council Response:**

- 2.1 BRD030 is around 75.5ha in size (excluding existing built form to be retained) and is proposed to be allocated as a mixed-use Sustainable Urban Extension. Proposed uses include 1,050 dwellings, 16ha of employment land, a new local centre, 20ha of green infrastructure and a 19ha linear park. 600 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 2.2 In addition, to providing certainty about the ability to meet future development needs at Bridgnorth, which is partly inset within the Green Belt, an area of land outside the proposed development boundary and adjoining this proposed site allocation (forming part of the wider site promotion) has been identified as a potential future direction of growth for Bridgnorth beyond the proposed plan period to 2038. This land would remain open countryside and its future development would be dependent on its allocation within a future Local Plan strategy.
- 2.3 For the avoidance of doubt, the 19ha linear park proposed as part of BRD030, as a use compatible with countryside locations, is expected to extend beyond the extent of the proposed allocation into the potential future direction of growth.
- 2.4 Detailed development guidelines within Schedule S3.1(i) of draft Policy S3.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site. The development guidelines for BRD030 conform with the plan strategy in draft Policies SP1; SP2 and the specific economic strategy and employment generating uses in SP13 and SP14 and this site should principally provide the primary use classes of B2, B8, E(g) and appropriate sui generis uses.
- 2.5 The development guidelines indicate the employment land will be provided in a gateway location on the site and will benefit from a

high-quality design and layout. It provides an opportunity for freehold employment land targeted towards office (E(g)(i)) and to research and development uses (E(g)(ii)). In this way, the employment development will complement wider employment opportunities in Bridgnorth and contribute towards the objectives of the Shropshire Economic Growth Strategy.

- 2.6 This proposed employment allocation would complement or combine with the saved employment allocations in the same location at Tasley. These two existing employment site proposals will deliver a new Business Park in the west of the town. They will also relocate the existing Livestock Market to facilitate an existing proposed housing development with commercial services to be developed on and adjoining the site of the existing Livestock Market.

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

**Shropshire Council Response:**

- 3.1 The proposed scale and type of employment uses for this site are indicated by the Plan Strategy and Strategic Policies and the associated development guidelines within Schedule S3.1(i) of draft Policy S3.1. The development guidelines are 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 of BRD030.
- 3.2 It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter which is summarised in the Statement of Common Ground (SoCG7 and SoCG7a).
- 3.3 Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.
- 3.4 The allocation of BRD030 provides a strategic employment allocation of 16ha, extends the saved employment allocation of 6.7ha at Tasley (totalling 23ha) and strengthens the strategic role and function of Bridgnorth as a Principal Centre.
- 3.5 This cumulative employment land provision of 23ha in Tasley strengthens the employment land offer in east Shropshire which is identified in Table 41 of the Employment Strategy Topic Paper (GC4n). This provision also contributes towards the significance of the Principal Centres in the employment land supply, which is identified in Table 17.1 of the updated Housing and Employment Topic Paper – April 2024 (GC45).



**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, with two Statements of Common Ground (SoCG07 and SoCG07a) completed between the Council and the site promoter. An Environmental Scoping Opinion (24/02859/SCO) has recently been sought in relation to the potential future development of this site.

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

**Shropshire Council Response:**

- 5.1 BRD030 is a proposed mixed-use allocation for 1,050 dwellings, 16ha of employment land, a new local centre, 20ha of green infrastructure and a 19ha linear park. 600 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 5.2 As such, key benefits of the proposed development include:
- a. The provision of housing to contribute to meeting the needs of all groups within the town and other communities in the Place Plan area. This includes the need for local employer and key worker housing.
  - b. Supporting the housing needs of the Black Country, through the accommodation of part of the proposed contribution to the unmet housing needs forecast to arise in the Black Country.
  - c. The provision of employment land in a gateway location and targeted towards office and research & development uses, providing employment opportunities for residents of the town and other communities in the Place Plan area.
  - d. The provision of a new local centre comprising an appropriate range of retail and community uses.
  - e. The provision of a new linear park and extensive areas of other open space.
- 5.3 Furthermore, Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Bridgnorth and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of BRD030 and the wider draft policies in the draft Shropshire Local Plan.

- 5.4 The site location, along with the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town including the existing employment land provision at Tasley within the saved employment allocations ELR011a and ELR011b.
- 5.5 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; 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 housing, employment in a gateway location, a new local centre comprising an appropriate range of retail and community uses, a new linear park and extensive areas of other open space. Non-residential development will form an intrinsic component of the development, occurring alongside and cross-subsidised by housing.
  - b. Ensuring development achieves garden village principles and complements the character of Bridgnorth, informed by a masterplan and design code.
  - c. Ensuring development maximises energy efficiency and achieves on-site renewable/low-carbon energy generation.
  - d. Safeguarding natural environment assets in proximity of the site and retaining and enhancing on-site mature trees, hedgerows, structural vegetation and key existing green infrastructure corridors.
  - e. Retaining non-designated heritage assets on the site and using green infrastructure to create appropriate settings for heritage assets.
  - f. Retaining historic field patterns in the grain of the development.
  - g. Appropriately buffering noise from the A458, employment uses on/off site, and mineral activities in the surrounding area.
  - h. Providing necessary improvements to the highway network, including the A458 Ludlow Road roundabout.
  - i. Enhancing pedestrian, cycle and vehicular links to and through the site – particularly over the A458. This includes a footbridge crossing of the A458, subject to ground investigations and available land – further information provided in SoCG07a.
  - j. Enhancing public transport links to the site and investigating the potential to operate a dedicated park and ride service from the site, linked to the new local centre.
- 5.6 More generally, it is also considered that development of BRD030 will contribute to the achievement of the proposed vision, objectives

and spatial strategy for Shropshire. It will also support the ability of the Black Country to meet their housing needs.

**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 BRD030 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 BRD030.
- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BRD030 constituted an appropriate proposed mixed-use 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 BRD030 within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Separation between the site and the built form of Bridgnorth caused by the A458.
    - i. Site guidelines stipulate expectations for pedestrian and cycle links over the A458 (including a footbridge crossing, subject to ground investigations and available land – further information provided in SoCG07a) to encourage safe and sustainable patterns of movement between the site and the wider town.
    - ii. Site guidelines also outline expectations for services and facilities on the site. This includes 2ha of land for a new primary school, land for a new medical centre if required by the Integrated Care Board (ICB), a local centre comprising of an appropriate range of retail and community uses, and appropriate public transport links to the site – including investigation of the potential to operate a dedicated park and ride service.
  - b. Location within the impact risk zone for Sites of Special Scientific Interest (SSSI), presence of an environmental network corridor

along much of the western boundary and proximity of other environmental assets. Site guidelines require natural environment assets on and in proximity of the site to be safeguarded and appropriately buffered; mature trees, hedgerows, structural vegetation and key green infrastructure corridors to be retained and enhanced; and provision of extensive areas of open space – including a new linear park. Site guidelines also require incorporation of a multi-stage sustainable drainage system and water treatment facilities. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

- c. Presence of mature trees and hedgerows on-site. Site guidelines therefore require mature trees, hedgerows, structural vegetation and key green infrastructure corridors to be retained and enhanced.
- d. Presence of heritage assets on-site and in proximity. Site guidelines require design and layout to reflect and respect the site's heritage and heritage assets within the wider area; listed and non-designated historic farm buildings to be retained; green infrastructure will create appropriate settings for identified heritage assets; and historic field patterns to be retained in green infrastructure and the grain of the development. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
- e. Location within the Coal Authority reference area and mineral safeguarding area. This has been appropriately considered within the site assessment.
- f. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to the majority of the land around Bridgnorth. This has been appropriately considered within the site assessment.
- g. A small component of the site is located within the fluvial flood zones 2 and/or 3, the surface water flood risk zones, and within proximity of a detailed river network. Site guidelines stipulate that development will be excluded from the portions of the site located in flood zones 2 and/or 3. They also require multi-stage sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- h. In the context of employment development, the site is deemed to have medium-high landscape and visual sensitivity. This has been appropriately considered within the site assessment. Furthermore, site guidelines include a range of expectations on site design and layout to ensure they positively respond to and mitigate this matter. There will be a further opportunity to

mitigate for any localised landscape impacts in determining the detailed boundaries for the employment area within the Garden Village.

- i. Noise associated with the adjoining A458 and existing / proposed employment areas. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage any noise arising from these and other sources.
- j. Proximity to site allocations for employment development, including relocation of the livestock market. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage this relationship.
- k. Proximity to active quarries and an allocation to extend one of these quarries. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage this relationship.
- l. Relationship to a site subject to a planning application for poultry units. This proposal was refused at appeal.

**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 BRD030.
- 7.4 With specific regard to flood risk across the entirety of the BRD030 site promotion, in summary:
  - a. With regard to fluvial flood risk, around 6% is located within Flood Zone 2 and around 5% within Flood Zone 3 (please note,

flood zones 2 and 3 overlap). However, much of this component of the site is located within the potential future direction of growth.

- b. With regard to other sources of flood risk, around 1% is located within the 30 year surface flood risk zone, around 4% is located within the 100 year surface flood risk zone, and around 7% is located within the 1,000 year surface flood risk zone.
- 7.5 The proposed site guidelines for BRD030 within Schedule S3.1(i) of draft Policy S3.1 address this issue, stating *"The site will incorporate multi-stage sustainable drainage system features and water treatment facilities, informed by a sustainable drainage strategy. Water runoff will be restricted to the equivalent greenfield rate and water quality in the wider drainage network will be protected. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site. Development will also be excluded from the portions of the site located in Flood Zones 2 and/or 3. These areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6 The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BRD030. It concluded that the site BD030 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 BRD030 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 BRD030.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BRD030

constituted an appropriate proposed employment allocation within the Garden Village; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.

- 8.3 The draft site guidelines for BRD030 within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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 a comprehensive mixed-use development that achieves garden village principles and complements the character of Bridgnorth, informed by a masterplan and design code. Housing should occur alongside and cross-subsidise employment, the local centre and green infrastructure (including new linear park).
  - b. Providing significant physical, social and green infrastructure relating to the employment development:
    - i. Forming a gateway location on the site providing a high-quality design and layout with opportunities for freehold employment land including office and research and development requiring significant physical infrastructure investment in the highway layout, drainage and lighting and in water, energy and communications utilities and investment in ancillary 'service' facilities for the businesses and employees using the extensive employment area.
    - ii. Providing a green infrastructure buffer to the A458, existing/proposed employment, mineral activities in the surrounding area, heritage assets on and in proximity of the site, and ecological assets on and in proximity of the site.
    - iii. Providing necessary improvements to the highway network including the A458 Ludlow Road roundabout.
    - iv. Retaining existing public rights of way to the site.
    - v. Providing appropriate accesses to the site.

- c. Providing significant physical, social and green infrastructure relating to the larger housing development:
    - i. A new local centre comprising an appropriate range of retail and community uses.
    - ii. Providing 2ha of land for a new primary school on the site.
    - iii. If required, providing land for a new medical centre on the site.
    - iv. Providing extensive areas of green infrastructure, including playing fields and a new linear park.
    - v. Retention and enhancement of trees, hedgerows, structural vegetation, key green infrastructure corridors and other key environmental assets on the site.
    - vi. Retention of existing field patterns within the grain of the development.
  - d. Retention of heritage assets on the site.
  - e. Enhancing pedestrian, cycle and vehicular links to and through the site – particularly over the A458. This will include but not be limited to a raised pedestrian and cyclist footbridge crossing of the A458 at an appropriate location near the Ludlow Road roundabout, subject to ground investigations and available land.
  - f. Enhancing public transport links to the site and investigating the potential to operate a dedicated park and ride service from the site, linked to the new local centre.
  - g. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6 Shropshire Council expects 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 Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter. They address key infrastructure requirements and demonstrate the site is viable and deliverable.
- 8.8 In particular, paragraph 1.32 of SoCG07a includes *"The economic viability of the site has been reviewed and it is agreed that the development is economically viable and capable of delivering the required infrastructure having regard to the proposed site guidelines and proposed requirements of the policies of the draft Shropshire Local Plan."*
- 8.9 The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable



development of BRD030. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.

- 8.10 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.
- 8.11 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 BRD030 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 A0609), the promoter of BRD030 state *"Tasley Garden Village is an available, suitable and deliverable site and therefore the inclusion in the draft Local Plan Review is fully supported."* They also state *"Taylor Wimpey can confirm that Tasley Garden Village would be a policy compliant development and deliver all the necessary requirements on site."*
- 9.4 The Development Statement submitted as part of this Regulation 19 Representation states *"Taylor Wimpey has reviewed the economic viability of the site and proposals in terms of land values, market attractiveness/demand sales rates and development costs and can*

*confirm that the development is economically viable and capable of delivering the required infrastructure."*

- 9.5 Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter, which provide further confidence on the viability and deliverability of the site.
- 9.6 In particular, paragraph 1.32 of SoCG07a includes "*The economic viability of the site has been reviewed and it is agreed that the development is economically viable and capable of delivering the required infrastructure having regard to the proposed site guidelines and proposed requirements of the policies of the draft Shropshire Local Plan.*"

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

**Shropshire Council Response:**

- 10.1 Expected timescales and rates of development on proposed allocation BRD030 are summarised within Appendix 7 of the draft Shropshire Local Plan.
- 10.2 In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2037/38. The Council anticipates that the employment development will be delivered at a point where infrastructure investments may be cross subsidised by receipts from housing development.
- 10.3 However, Shropshire has experienced higher rates of employment development since 2016, identified in the Authority Monitoring Report (2020) (EV012). There is also, a recognised shortfall in employment land across the West Midlands. Therefore, the scale of provision at 16ha (within a cumulative 23ha) and the freehold availability of land on BRD030, may encourage demand that triggers an earlier release of employment land within Tasley Garden Village.
- 10.4 Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable but there is reason to anticipate an earlier delivery of the employment development on BRD030.
- 10.5 Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter, which provide further confidence on the viability and deliverability of the site.
- 10.6 Within SoCG07a paragraph 1.33 stipulates that "*There is broad agreement between the parties regarding the housing delivery*

*trajectory for the site; although Bloor and Taylor Wimpey consider that development on the site will be delivered quicker than Shropshire Council's assumptions."*

- 10.7 An Environmental Scoping Opinion (24/02859/SCO) has recently been sought in relation to the potential future development of this site.

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

**Shropshire Council Response:**

- 11.1 The boundary proposed for BRD030 was informed by initial masterplanning undertaken by the site promoter (which formed part of the material prepared in support of the promotion of this site), duly considered by the Council through its site assessment process.
- 11.2 The proposed site guidelines for BRD030 within Schedule S3.1(i) of draft Policy S3.1 require a more comprehensive masterplanning process to be undertaken to inform any future planning application and development of the site.
- 11.3 Consistent with this expectation, the site promoter has progressed a more comprehensive masterplanning exercise, to inform the potential sustainable development of the site - achieving proposed site guidelines, achieving wider policy requirements, and responding to the change in land control and implications for future phasing of development. This process has been informed by positive dialogue with Shropshire Council.
- 11.4 Within the Statement of Common Ground (SOCG07a) between the Council and the site promoter it was agreed in paragraph 1.6 that *"through the ongoing masterplanning process consideration is being given to the design, layout and the suitable phasing of development and infrastructure delivery. In the event that both parties agree that the ongoing masterplanning process identifies an opportunity to improve the development through an amendment to the proposed Tasley Garden Village allocation boundary, an appropriate main modification to the Plan could be proposed."*
- 11.5 Through the consideration of design, layout and the suitable phasing of development and infrastructure delivery within the more comprehensive masterplanning process, the site promoter has identified a proposed amendment to the allocation boundary for BRD030.
- 11.6 They consider this would allow for the achievement of a number of benefits, whilst still achieving the same quantum of development and retaining a potential future direction of growth (thereby

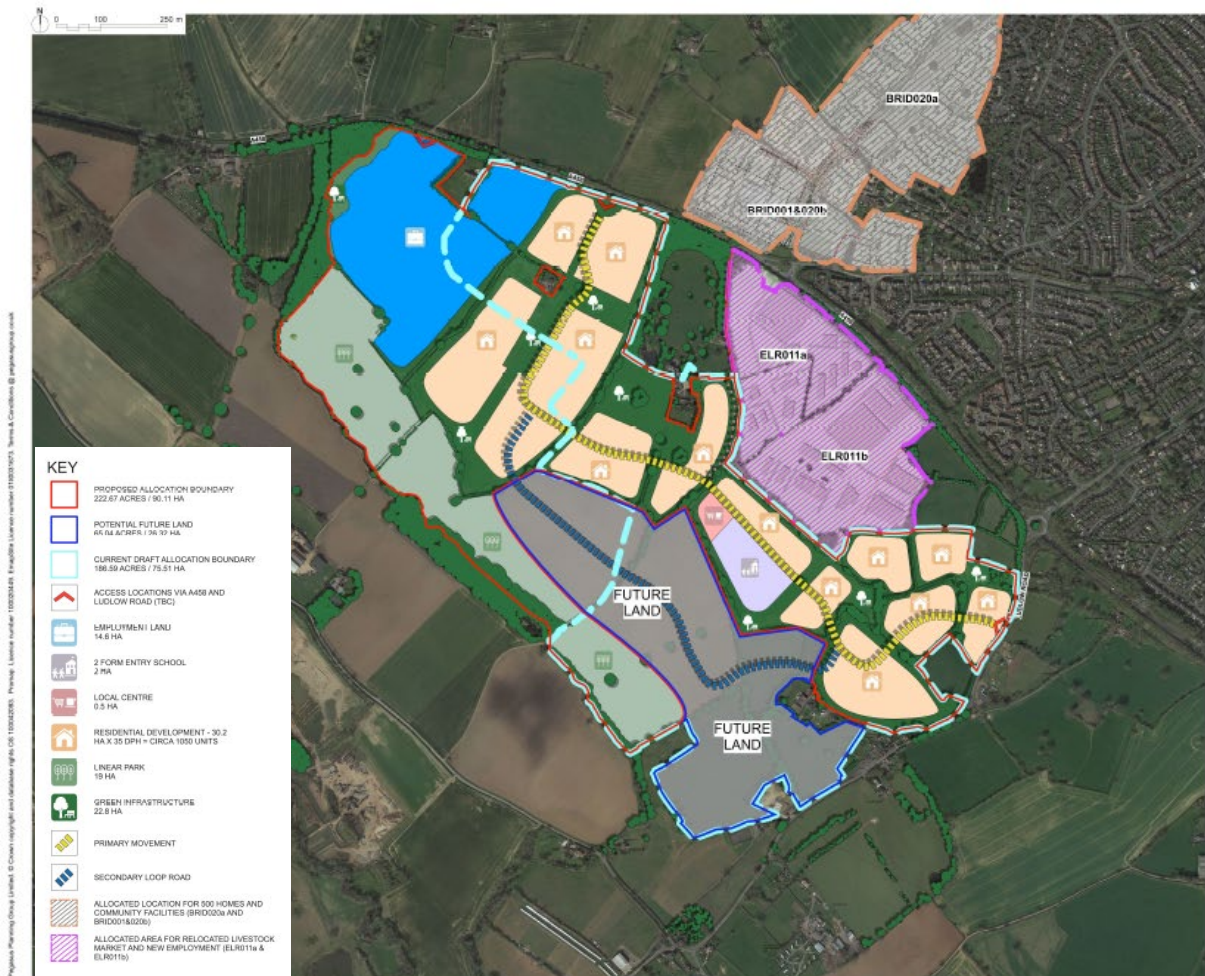
providing confidence in the ability to achieve development needs in the longer term).

11.7 Specifically, the site promoter considers the benefits of their proposed amendment to the allocation boundary for emerging allocation BRD030 include:

- a. Achieving a more effective layout - enhancing the relationship between housing, employment and the linear park.
- b. Allowing for the early delivery of infrastructure.
- c. Allowing for employment to be located in a more visually prominent location, with greater flexibility for end-users and greater separation from heritage assets.
- d. Providing greater certainty regarding the location of the linear park.
- e. Allowing for two independent accesses onto the A458, one to serve housing and the other to serve employment.

11.8 Figure 11.1 illustrates the site promoters proposed amendment to the allocation boundary for emerging allocation BRD030.

**Figure 11.1: Site Promoters Proposed Amendment to the Allocation Boundary for BRD030**



- 11.9 Shropshire Council has considered the more comprehensive masterplanning undertaken by the site promoter and understands the logic of and potential benefits associated with the proposed amendment to the proposed allocation boundary for BRD030.
- 11.10 As such, the Council is supportive of a proposed main modification to amend the allocation boundary for BRD030 to reflect the outcome of this more comprehensive masterplanning - as identified in Figure 11.1. This would result in an increase to the extent of the site to around 90ha, primarily to reflect the intention to incorporate the entirety of the linear park into the proposed allocation.
- 11.11 Associated main modifications would also be required regarding the location and extent of the potential future direction of growth, which would be reduced to around 26.5ha, primarily to reflect the intention to incorporate the entirety of the linear park into the extent of the proposed allocation.
- 11.12 These proposed main modifications would also provide an opportunity to detail the general location of housing, employment, the local centre, and the linear park proposed on the site.
- 11.13 Importantly, this proposed main modification would **not** result in an amendment to the quantum of development proposed on the site or the expectation that the site achieves compliance with the site guidelines within Schedule S3.1(i) of draft Policy S3.1 and the requirements of wider policies in the draft Shropshire Local Plan.

**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 BRD030 within Schedule S3.1(i) of draft Policy S3.1 are effective, justified and consistent with national policy (subject to main modifications proposed within GC4m).
- 12.2 However, Shropshire Council recognises that consistent with the draft site guidelines, the site promoter has undertaken more comprehensive masterplanning to inform the potential sustainable development of the site - achieving proposed site guidelines, achieving wider policy requirements, and responding to the change in land control and implications for future phasing of development. It is also recognised that this process will involve engagement with the community and Shropshire Council.
- 12.3 On balance, the Council considers this constitutes an appropriate process to inform proposals for the site. As such, the Council would

support a main modification to the relevant draft settlement guideline as follows:

*The development of this site will be in accordance with a vision, design code and masterplan which will be prepared in consultation with the public and ~~adopted as a Supplementary Planning Document~~ **approved** by Shropshire Council. This will represent a significant material planning consideration and must be completed before **granting** any planning application for development of the site.*

- 12.4 Site guidelines within Schedule S3.1(i) of draft Policy S3.1 address the key requirements and considerations for the development of BRD030; 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.
- 12.5 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 BRD030.
- 12.6 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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).
- 12.7 These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.8 Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of BRD030 – 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 BRD030.
- 12.9 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 BRD030, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process.

12.10 The site guidelines will also:

- a. Support the delivery of local employment, the modernisation of the commercial building stock, the more efficient use of employment land, and the achievement of the proposed employment land requirement for Shropshire - consistent with the aspirations of paragraphs 8, 81, 82 and 84 of the NPPF.
- b. Promote access to services, facilities and infrastructure - consistent with paragraphs 100, 104-106, 110-113; and 114 of the NPPF.
- c. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
- d. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- e. Achieve well designed places – consistent with paragraphs 126, 127, 130 and 131 of the NPPF.

12.11 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections and support for specific site guidelines proposed for BRD030. These are summarised in SD014.01 and GC4o. Dealing with main objections in turn:

- a. Greater clarity required regarding the process for preparing an SPD for the site and implications for development timescales. Shropshire Council has proposed a further main modification on this matter above.
- b. Important sufficient flexibility is provided regarding the types of employment to support delivery. Shropshire Council considers the guidelines are sufficiently flexible, targeting employment provision towards office and research & development uses, but allow other suitable employment uses where they conform with the wider policies of the draft Shropshire Local Plan, particularly draft Policy SP12.
- c. The proposed local centre should be designated in the retail hierarchy to assist delivery. Shropshire Council does not consider it is necessary or appropriate for this proposed local centre to be designated within the retail hierarchy.
- d. Delivery of the local centre should not be linked to the first phase of development. Shropshire Council considers this is expectation is appropriate and recognises the importance of providing services and facilities early within a development of this scale.
- e. A pedestrian footbridge on desire lines is not achievable. Shropshire Council considers this requirement is appropriate and achievable. The requirement is for a footbridge over the A458 to be provided an appropriate location near Ludlow Road

roundabout, subject to ground investigations and available land. Further information on achievability is provided in SoCG07a.

- f. Condition regarding closure of poultry units is not effective or unnecessary. This proposal was refused at appeal and as such the Council has proposed a main modification to delete this requirement within GC4m.
- g. Amount of on-site renewable and low-carbon energy generation should not be established in these guidelines. Shropshire Council considers this requirement is appropriate and consistent with draft Policy DP11.
- h. Recommend any Planning Application is accompanied by a heritage statement and archaeological assessment. Shropshire Council supports this principle and has proposed a main modification on this matter within GC4m.
- i. Retention of non-designated historic farm buildings is not justified and the guideline is too imprecise. Shropshire Council considers this requirement is appropriate, consistent with the conclusions of the site assessment process and consistent with wider draft Policies in the draft Shropshire Local Plan. Those buildings which do and do not constitute non-designated heritage assets on the site will be determined during any future Planning Application process, informed by appropriate technical assessments and comments from relevant statutory consultees. However, for clarity the Council has proposed a main modification to amend reference from non-designated historic farm buildings to non-designated heritage asset within GC4m.
- j. Green infrastructure should 'safeguard' rather than 'create' settings for historic assets. Shropshire Council supports this clarification and an appropriate main modification is proposed within GC4m.
- k. Guidelines should require demonstration of how playing fields and associated facilities will be managed and maintained. Shropshire Council supports this clarification, which is consistent with the requirements of draft Policy DP16. An appropriate main modification is proposed within GC4m.
- l. Flexibility required to allow off-site provision of open space to meet needs. Shropshire Council supports this clarification and an appropriate main modification is proposed within GC4m.



**Questions: Site Allocation LUD052 – Land south of The Sheet on A49, Ludlow – see MM089**

**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 employment allocation LUD052 comprises 2.6 hectares which is proposed for 65 dwellings. The site adjoins the A49 Trunk Road to the west and the existing 'saved' employment allocation of ELR058 which fronts onto Sheet Road to the north. ELR058 with LUD052 adjoins the roundabout junction of the A49 / Sheet Road. To the east, LUD052 adjoins the open land around an adjacent farm complex and to the south, adjoins the open farmland in the countryside around Ludlow.
- 1.2. 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).
- 1.3. Stages 2a, 2b and 3 of the site assessment process are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 8 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Ludlow is summarised within SD006.12.
- 1.4. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.5. Stage 2b of the site assessment process was a screening exercise which considered the availability; size and strategic suitability of the site. 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 those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
  - b. *Availability:* Sites were 'filtered out' of the site assessment process where uncertainty remained 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 were considered to show the site was unsuitable for development.
- 1.6. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where conclusions were reached about their proposed status within the draft Shropshire Local Plan.
  - 1.7. 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 (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), 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.
  - 1.8. 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 Ludlow 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 the planning application register, and consideration of land owned by the public sector.
  - 1.9. Within Stages 2a and 2b of the site assessment process, around 37 sites were considered at Ludlow. Within Stage 3 of the site assessment process, around 17 sites were considered at Ludlow.
  - 1.10. LUD052 was proactively promoted for employment development during the plan-making process and ultimately identified as a proposed employment allocation through the site assessment process.
  - 1.11. 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 LUD052 was identified as a proposed employment

allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.12. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site guidelines for LUD052 as a proposed allocation. This objection is summarised in SD014.01 and GC4o which shows:
  - a. Representations on the site guidelines for LUD052 sought an additional requirement for low rise development and a future Local Development Order to control future permitted development rights.
- 1.13. Shropshire Council considers that the site assessment process and site guidelines have addressed the heritage impacts of the proposed development and provided appropriate guidelines for the proposed development which support the strategy and policies of the Plan. This is supported by Main Modification MM089 to require that the site design should pay particular attention to building height, layout and materials.
- 1.14. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation included support and objection to the site assessment process which identified LUD052 as an appropriate location for employment development. These responses are summarised in GC52. There were no further objections to LUD052 in response to this additional consultation.
- 1.15. In conclusion, Shropshire Council considers that LUD052 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 8 of GC44.

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

**Shropshire Council Response:**

- 2.1. LUD052 is proposed to be allocated for employment development. This site comprises 5.0ha of greenfield land situated on the eastern edge of Ludlow which is designated as a Principal Centre. This site is located in the area known as The Sheet situated on the opposite side of the A49 from the existing built form of Ludlow.
- 2.2. Detailed development guidelines within Schedule S10.1(ii) of draft Policy S10.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site. The specific employment generating uses on the site would be particularly influenced by draft Policies SP1; SP2;

SP13 and SP14. The development guidelines indicate the site is proposed to be principally for development within primary employment use classes B2, B8, E(g) and appropriate sui generis uses.

- 2.3. This proposed employment allocation would complement and extend the saved employment allocation ELR058 from 3.5ha up to a total area of 8.5ha. The existing employment site ELR058 will deliver a new Business Park in the east of the town to complement the existing Eco-Park to the north, which is nearing completion.
- 2.4. ELR058 has recently received permission for a Class E(a) retail use which will provide the principal highway access into the larger employment site along with drainage, utility and telecommunications infrastructure.

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

**Shropshire Council Response:**

- 3.1. The proposed type of employment uses and the associated development guidelines within Schedule S10.1(ii) of draft Policy S10.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of LUD052.
- 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. This site has not progressed to the submission of a planning application to develop this land. It is expected that this land would be developed following the completions of the existing saved employment allocation ELR058.

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

**Shropshire Council Response:**

- 5.1 The proposed employment allocation LUD052 comprises 2.6 hectares which is proposed for 65 dwellings. The site adjoins the A49 Trunk Road to the west and the existing 'saved' employment allocation of ELR058 which fronts onto Sheet Road to the north. ELR058 with LUD052 adjoins the roundabout junction of the A49 / Sheet Road. To the east, LUD052 adjoins the open land around an adjacent farm complex and to the south, adjoins the open farmland in the countryside around Ludlow.
- 5.2 The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the development to the north of Sheet Road. This comprises an area of mixed commercial and residential development to the north of Sheet Road.
- 5.3 As such, key benefits of the proposed development include:
  - a. The provision of employment to contribute to meeting the needs of Ludlow and other communities in the Place Plan area.
  - b. LUD052 makes a complementary provision of additional employment land to 'saved' allocation ELR058 to extend the capacity of this proposed employment area to serve the needs of Ludlow.
  - c. LUD052 benefits from being located on an important junction of the A49 at Ludlow and from proximity to the existing Ludlow Eco-Park which is a proven commercial investment location providing high quality, modern commercial floorspace at Ludlow.
  - d. Development is now approved at ELR058 for a significant retail use which will benefit LUD052 through the provision of access and service infrastructure into the proposed employment area and providing retail services to future business uses on LUD052.
- 5.4 Furthermore, Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Ludlow and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of LUD052 and the wider draft policies in the draft Shropshire Local Plan.
- 5.5 The site location, along with the proposed policy framework, will effectively ensure the development integrates into and complements the existing employment land provision at ELR058.

- 5.6 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. LUD052 will extend the existing employment allocation ELR058 to create a critical mass for development in terms of the provision of infrastructure and the suitability of the site for larger building footprints.
  - b. The land uses on the site will favour the 'primary' employment uses with an appropriate level of 'secondary' employment uses.
  - c. The mix of uses to be determined in relation to Policy SP13 and located and designed to respect the significance and setting of this historic town.
  - d. Development to deliver good contemporary design with appropriate use of layout, height, materials, layout and landscaping.
  - e. Scheme to provide improvements to the A49 / Sheet Road junction subject to requirements of Highways England and suitable access to site to serve combined needs of saved allocation ELR058 with LUD052 and with the adjacent farmstead.
  - f. Landscaping and open space to protect trees (west and south-east) with buffering and additional structural planting. Site design to allow passage, foraging and habitat for species and improve green infrastructure around the town.
  - g. Structural planting to screen buildings from distant views and reduce impacts of development on the landscape.
  - h. The development should consider the relative isolation of this larger proposed employment area from services in Ludlow and the effect of the A49 on access to facilities at the Sheet Road/Foldgate Lane services. Improved access over the A49 or some limited service provision in the development should be considered to serve the employment uses.
- 5.7 More generally, it is also considered that development of LUD052 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 LUD052 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 LUD052.

- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LUD052 constituted an appropriate employment 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 LUD052 within Schedule S10.1(i) of draft Policy S10.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. LUD052 should protect hedgerows and field edge trees but the core of the site is free of constraints. Site guidelines require Site design to allow passage, foraging and habitat for species and improve green infrastructure around the town.
  - b. LUD052 should respect the setting of Scheduled Monument of Caynham Camp (NHLE ref. 1010313), which is a probable Bronze Age ring ditch and Iron Age settlement (HER PRN 30994) and also a possible Roman fort (HER PRN 04532). Site guidelines require the following:
    - i. Proportionate Heritage Impact Assessment (HIA) will be needed to consider cumulative impacts on the significance of the heritage assets in the historic town (west) including their settings.
    - ii. Proportionate Heritage Impact Assessment (HIA) should also consider the significance of the scheduled monument Caynham Camp (east), including its setting. 5.0 hectares (1.94ha net development).
    - iii. The findings of the HIA should be taken into account in the design of the development.
  - c. The western boundary of LUD052 forms an environmental network corridor which should be buffered by the Green Infrastructure Network. Site guidelines require the following:
    - i. Landscaping and open space to protect trees (west and south-east) with buffering and additional structural planting.
    - ii. Relevant supporting studies should be undertaken including ecology to take account of adjacent SSSI, tree and hedgerow surveys to protect existing boundary treatment, to screen the

site and conserve and enhance the Green Infrastructure around the town with their recommendations clearly reflected in the proposed development scheme.

- d. Highway access to Sheet Road is expected to be shared with 'saved' employment allocation ELR058. Site guidelines require the following:
  - i. Scheme to provide improvements to the A49 / Sheet Road junction subject to requirements of Highways England and suitable access to site to serve combined needs of saved allocation, LUD052 and adjacent farmstead.
  - ii. Improved access over the A49 or some limited service provision in the development should be considered to serve the employment uses.
  - iii. Relevant supporting studies should be undertaken particularly traffic and transport assessments with their recommendations clearly reflected in the proposed development scheme.
  - iv. Any other necessary improvements to the local and strategic road network will also be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact)
- e. LUD052 should receive mitigation from road noise from A49 to west. Site guidelines require the development to deliver good contemporary design with appropriate use of layout, height, materials, layout and landscaping.
- f. Medium-high visual sensitivity. This has been appropriately considered within the site assessment and the site guidelines require structural planting to screen buildings from distant views and reduce impacts of development on the landscape.
- g. Applying the precautionary principle, the site consists of best and most versatile agricultural land. 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 which informs 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) which considers flood risk from all sources.



- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation LUD052 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at LUD052 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across the site.
- 7.5. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation LUD052 passed the sequential test and the exception test was not required.
- 7.6. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for LUD052 within Schedule S10.1(ii) of Draft Policy S10.1 address this issue further, stating *"Relevant supporting studies should be undertaken particularly traffic and transport assessments, heritage impact, ecology to take account of adjacent SSSI, tree and hedgerow surveys to protect existing boundary treatment, to screen the site and conserve and enhance the Green Infrastructure around the town, to manage flood risk and drainage with their recommendations clearly reflected in the proposed development scheme."*

**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 LUD052 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 LUD052.

- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LUD052 constituted an appropriate proposed employment allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for LUD052 within Schedule S10.1(i) of draft Policy S10.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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. This site will extend an existing employment allocation to create a critical mass for development in terms of the provision of infrastructure and the suitability of the site for larger building footprints.
  - b. Scheme to provide improvements to the A49 / Sheet Road junction subject to requirements of Highways England and suitable access to site to serve combined needs of saved allocation, LUD052 and adjacent farmstead.
  - c. Any other necessary improvements to the local and strategic road network will also be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
  - d. Landscaping and open space to protect trees (west and south-east) with buffering and additional structural planting to improve green infrastructure around the town.
  - e. Structural planting to screen buildings from distant views and reduce impacts of development on the landscape.
  - f. Improved access over the A49 or some limited service provision in the development should be considered to serve the employment uses.
  - g. Relevant supporting studies should address the need for investment to manage flood risk and drainage with their recommendations clearly reflected in the proposed development scheme.

- 8.6 Shropshire Council expects 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 LUD052. 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 LUD052 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of LUD052 stated *"We would support the Council's assessment that proposed employment land allocation LUD052, together with saved employment land allocation ELR058 is unconstrained, viable, deliverable and developable."* And

also stated *"I trust this provides sufficient assurance that the site is viable and deliverable, having regard to the policy requirements in the draft Plan"*.

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation LUD052 are summarised within Appendix 7 of the draft Shropshire Local Plan.
- 10.2. In summary, the Council anticipates that development of the site will commence on the adoption of the Plan around 2024/25 and continue until 2029/30. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of LUD052 stated *"We would support the Council's assessment that proposed employment land allocation LUD052, together with saved employment land allocation ELR058 is unconstrained, viable, deliverable and developable."* And also stated *"I trust this provides sufficient assurance that the site is viable and deliverable, having regard to the policy requirements in the draft Plan"*.

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation LUD052 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 LUD052.
- 11.3. LUD052 adjoins the A49 Trunk Road to the west and the existing 'saved' employment allocation of ELR058 which fronts onto Sheet Road to the north. ELR058 with LUD052 adjoins the roundabout junction of the A49 / Sheet Road. To the east, LUD052 adjoins the

open land around an adjacent farm complex and to the south, adjoins the open farmland in the countryside around Ludlow.

**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 LUD052 within Schedule S10.1(i) of draft Policy S10.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of LUD052; 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 LUD052.
- 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 LUD052 – 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 LUD052.
- 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 LUD052, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process.

12.8 The site guidelines will also:

- a. Support the delivery of local employment, the modernisation of the commercial building stock, the more efficient use of employment land, and the achievement of the proposed employment land requirement for Shropshire - consistent with the aspirations of paragraphs 8, 81, 82 and 84 of the NPPF.
- b. Promote access to services, facilities and infrastructure - consistent with paragraphs 100, 104-106, 110-113; and 114 of the NPPF.
- c. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
- d. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- e. Achieve well designed places – consistent with paragraphs 126, 127, 130 and 131 of the NPPF.

12.9 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines proposed for LUD052. These are summarised in SD014.01 and GC4o.

12.10 A single objection to the site guidelines for LUD052 sought an additional to requirement for low rise development and seeking a future Local Development Order to control future permitted development rights. Shropshire Council considers that the site assessment process and site guidelines have addressed the heritage impacts of the proposed development and provided appropriate guidelines for the proposed development which support the strategy and policies of the Plan. This is supported by Main Modification MM089 to require that the site design should pay particular attention to building height, layout and materials.

**Questions: Site Allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 – Land at Park Hall – see MM097**

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

**Shropshire Council Response:**

- 1.1. Shropshire Council proposes to allocate land for a mixed housing and commercial development in Park Hall to meet the needs of Oswestry, as part of this Local Plan Review. This reflects limitations to development around Oswestry at this time.
- 1.2. Park Hall is located to the north-east of Oswestry. Park Hall will maintain its current designation as a Community Cluster with the inclusion of this proposed residential-led allocation. The additional

commercial development land included in the allocation is recognised in the site development guidelines to enable ancillary commercial uses around the existing hospital and educational campuses at Park Hall.

- 1.3. This proposed allocation lies in the north of Park Hall, comprising 6 parcels of land. The site is bounded by the railway line to the east, Twmpath Lane to the north, North Drive to the west and a housing development of circa-2018 to the south.
- 1.4. To inform the identification of proposed site allocations, including this Park Hall allocation, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.5. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.6. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022). The most recent iteration of Stage 3 of this assessment is summarised within Appendix O (SD006.16) of the Sustainability Appraisal and Site Assessment Report (SD006.01).
- 1.7. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.8. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of site availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability

Assessment). These constraints are such that it was considered they were unsuitable for development.

- 1.9. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.10. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal (SD006.16), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.11. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.12. Within Stages 2a and 2b of the site assessment process, around 78 sites were considered at Oswestry. Within Stage 3 of the site assessment process, around 44 sites were considered at Oswestry.
- 1.13. PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 were proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.14. Proposals for the site were subject to and informed by the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to



the site assessment process undertaken to identify proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032. These objections included:

- a. The site location presents conflicts - it is an allocation for Oswestry, but is some distance from the town in Whittington Parish and will benefit from employment sites in Gobowen Parish. Shropshire Council considers the proposed allocation constitutes a suitable location for development to meet the needs of Oswestry. The site has been identified through a proportionate and robust site assessment process.
  - b. Allocation of CIL monies arising will be problematic. Shropshire Council considers that the CIL Regulations and draft Policy DP25 provide a clear framework for the allocation of CIL funds arising in Shropshire.
  - c. Parts of these site were rejected in the SLAA but no mitigation is proposed within the Sustainability Appraisal (SA). Shropshire Council considers the proposed allocation has been identified through a proportionate and robust site assessment process. This site assessment process fully justifies the identification of this site as a proposed allocation.
  - d. The allocations at Park Hall are not supported by proportionate evidence and are therefore unsound. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of this site as a proposed allocation.
  - e. Do not consider road infrastructure (narrow; prone to flooding; parts are without pedestrian footways; and poorly maintained) or schools (oversubscribed) are sufficient to support the Park Hall allocation. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Highway Officers. This site assessment process fully justifies the identification of this site as a proposed allocation.
  - f. Park Hall lacks local amenities to support this level of development. Shropshire Council considers the site assessment process gave appropriate consideration to infrastructure constraints and opportunities. This site assessment process fully justifies the identification of this site as a proposed allocation.
- 1.16. In conclusion, Shropshire Council considers that PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 were 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. PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is proposed to be allocated for residential development with some ancillary commercial use. This site is some 12.21ha in size and the approximate site provision figure is 240 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.1(i) of draft Policy S14.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for the development of the site.
- 2.3. The specific residential development mix 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.
- 2.4. The proposed allocation allows for ancillary commercial uses related to the existing Derwen College and RJAH [Orthopaedic] Hospital. Any land that is used to provide commercial, retail or other services, may support the provision of employment or services for new or existing residents of Park Hall and Oswestry.

**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 S14.1(i) of draft Policy S14.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 3.2. It has also been informed by Regulation 18 Pre-Submission Draft of the Shropshire Local Plan consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

- 3.4. The inclusion of commercial land in this allocation seeks to achieve the objectives of sustainable development beyond the social objective of providing a sufficient number and range of homes.
- 3.5. Any commercial use will meet the ancillary development needs of existing employment generating uses and may help to meet the service needs of the Park Hall community (where existing service provision is limited) and Oswestry community.
- 3.6. The scale of development is considered to respect its setting and proximity to the significant developments at Derwen College and the RJAH [Orthopaedic] Hospital. The development of this proposed allocation would deliver sustainable development that balances all three sustainability objectives.

**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 continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

**Shropshire Council Response:**

- 5.1. PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the housing needs of the community of Oswestry 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 Oswestry and Shropshire.
- 5.3. The site's location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.

- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; the Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines and site assessments. These include:
- a. Ensuring the comprehensive development of the site, including the provision of vehicular, cyclist and pedestrian access between each component of the site and to the hospital and college.
  - b. Any necessary improvements to the local and strategic road network will be undertaken.
  - c. Provision for key worker dwellings in association with the RJAH hospital and Derwen College.
  - d. Ancillary commercial use in relation to the RJAH hospital and Derwen College to be incorporated into the site.
  - e. In order to achieve an appropriate access into PKH032 off Twmpath Lane, a roundabout may be required.
  - f. The development should complete the footpath along North Drive to the west of the site.
- 5.5. More generally, it is considered that development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that: PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 constituted an appropriate proposed residential-led allocation; it was possible to achieve sustainable development on the site which balanced all three sustainability objectives; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 were informed by the site assessment process and positively

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

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Contaminated land and unexploded ordnance on the site. Site guidelines require an appropriate assessment and management of contaminated land and unexploded ordnance.
  - b. The hedgerows and significant trees on the site should be retained and buffered. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. Noise, dust, odour from nearby commercial activities and noise from the road and railway line in proximity of the site west. Site guidelines require appropriate boundary treatments and mitigation through design and layout of development and buffering. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
  - d. Agricultural holding to the north of the site. Site guidelines require appropriate boundary treatments.
  - e. Potential impact on White Mere. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.1.
  - f. An Environmental Network corridor runs along the eastern boundary of PKH032 and will need to be appropriately buffered. Site guidelines require appropriate boundary treatments and draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

**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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 7.4. With specific regard to flood risk at PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032, in summary:
  - a. With regard to fluvial flood risk, proposed allocation, 0.91% of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is located in Flood Zone 3, 0.91% is located in Flood Zone 2 and 98.18% is in Flood Zone 1. There is therefore only a nominal fluvial flood risk to the site relating to the presence of watercourses.
  - b. With regard to other sources of flood risk, around 2.08% of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is located within the 1,000 year surface flood risk zone. None of the site lies within the 30 or 100 year flood risk zones. There is therefore only a nominal surface water flood risk in severe conditions.
- 7.5. The proposed site guidelines for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 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, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032. It concluded there was only a small amount of flood risk adjacent to the railway line, and this area would likely form part of a buffer strip within the development layout. The Flood Risk Sequential and Exception Test Assessment also indicates it is unlikely that floodwater would pass across the line of the railway.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 constitutes an appropriate proposed residential-led 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.16); Green Infrastructure Strategy (EV052.01-EV052.30); 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 – including provision of pedestrian, cyclist and vehicular access between all six components of the site and to the hospital and college.
  - b. Providing necessary improvements to the local and strategic road network. This may include the implementation of a roundabout on Twmpath Lane to provide a site access into the allocation from the north.
  - c. Providing appropriate access to the site.

- d. The development should complete the footpath along North Drive to the west of 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032. 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. Policy SP13 which addresses the requirement for employment generating uses to demonstrate the provision of sufficient infrastructure investment to serve the proposed uses.
  - d. Policies DP12 – DP24 which address the natural and historic environment.
  - e. 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 responses the promoters of each of the six parcels which form the overall allocation confirmed that the site is viable and deliverable.
- 9.4. The Viability and Deliverability Topic Paper (EV113) identifies the specific advice of the site promoters that: *"We can confirm this is a fully deliverable site... Our client is more than happy for his sites to be a mixed-use scheme to deliver housing, science park uses associated with the RJAH hospital, a convenience retail and local community services hub. The site has already had interest from a number of builders both local and regional who are interested in developing the site."* Finally it states, *"All of the land owners have spoken and have confirmed a willingness to work together to achieve deliverability of the site allocation forming Land at Park Hall (PKH002, PKH011, PKH013, PKH029, PKH031 and PKH032)."*

**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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 2025/26 and continue until 2037/38. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire. The Council anticipates that any commercial development will be delivered in accordance with the operational needs of the RJAH [Orthopaedic] Hospital and at a point where housing delivery would support the commercial development.
- 10.3. However, Shropshire has experienced higher rates of employment development since 2016, identified in the Authority Monitoring Report (2020) (EV012). There is also, a recognised shortfall in employment land across the West Midlands. Therefore, the limited scale of commercial land provided and the rate of economic

recovery in Shropshire might trigger an earlier development of the commercial land.

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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 11.3. The boundary for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is defined by the railway line to the east, North Drive to the west; Agnes Hunt Drive/The Old Piggery development (circa 2018) to the south; and Twmpath Lane and some existing dwellings to the north.

**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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032; 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.

- 12.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.16); Green Infrastructure Strategy (EV052.01-EV052.30); 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 – 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032, 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 local employment - consistent with the aspirations of paragraphs 8, 81, 82 and 84 of the NPPF.
  - b. Promote access to services, facilities and infrastructure - consistent with paragraphs 100, 104-106, 110-113; and 114 of the NPPF.
  - c. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - d. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - e. Achieve well designed places – consistent with paragraphs 126, 127, 130 and 131 of the NPPF.
- 12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included comments on specific site guidelines proposed for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 12.9 This includes concerns that whilst proposals for provision for key worker housing for the RJAH Hospital and Derwen College is

welcomed, there is no mechanism to secure it. Shropshire Council considers that the site guidelines provide an appropriate mechanism to ensure provision of key worker housing.

**Questions: Site Allocation SHF018b & SHF018d – Land east of Shifnal Industrial Estate, Upton Lane, Shifnal – see MM109**

**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 employment allocation SHF018b & SHF018d lies to the east of Shifnal, which is designated as a Key Centre. The significance of Shifnal is identified in the Hierarchy of Settlements Assessment (2020) (EV060). Shifnal is the largest Key Centre in Shropshire with a population of 6,991 persons (+14%) compared with the next largest Key Centre at 6,151 persons. Shifnal has 3,215 dwellings (+12%) compared with the next largest Key Centre at 2,879 dwellings.
- 1.2 The strategic significance of Shifnal reflects its location in east Shropshire, close to the County boundary with South Staffordshire and Wolverhampton. Shifnal is situated on the M54 road and rail corridor through the County, which connects with the strategic employment area of i54 and the M6 to the east. This strategic location is important to Shropshire's functional relationship with the Black Country identified in the Employment Strategy Topic Paper (GC4n).
- 1.3 Shifnal benefits from its connectivity by road on the A464 and A4169 and its rail connections from Shifnal station and from proximity to stations at Telford Central, Oakengates, Cosford and Albrighton. Shifnal is connected by road to other strategic centres at Telford, Codsall and Wolverhampton and to Strategic, Principal and Key Centres in Shropshire at Shrewsbury, Bridgnorth, Albrighton/Cosford and Market Drayton.
- 1.4 SHF018b & SHF018d comprises an extensive area of agricultural land comprising rural development and landscape features and is largely separated from the urban area of Shifnal. SHF018b adjoins Shifnal along its western and southern boundary where it adjoins the outer edge of the Hillcrest Shifnal School and the Shifnal Industrial Estate.
- 1.5 The proposed allocation comprises two distinct parcels. SHF018b (14ha) comprises agricultural land with a water abstraction facility, situated to the west of the centrally located Upton Lane. SHF018d

(25ha) comprises a larger area of agricultural fields, hedgerows, woodlands and watercourses to the east of Upton Lane.

- 1.6 SHF018b and SHF018d forms part of the West Midlands Green Belt within Shropshire. This proposed allocation is bounded by Stanton Road to the north (leading to the A41 and M54 Junction 3), the extensive wooded curtilage to the Hillcrest Shifnal School to the west, the Shrewsbury – Wolverhampton rail line to the south and a weaker pattern of agricultural field boundaries in the Green Belt to the east.
- 1.7 To inform the identification of proposed allocations in Shifnal, all site options for employment and housing development including SHF018b & SHF018d (29 hectares) were considered by the Council in a proportionate and robust three-stage site assessment process.
- 1.8 This also included a further land parcel SHF018c (79.6 hectares) to the north of Stanton Road, which together with SHF018b & SHF018d, formed the single, comprehensive site proposal received by the Council, in response to the call for sites. Further land parcel SHF018a to the south of Stanton Road was also proposed for development. Local representations suggested SHF018a (4.47 hectares) should be allocated for employment development in place of SHF018d (25.16 hectares).
- 1.9 The other site options for development in Shifnal comprised a large number of smaller land parcels which roughly encircled the town.
- 1.10 In the process of assessing these other options, a second comprehensive proposal was identified which incorporated sites SHF029, P15b west, P16a, P17a and also SHF017 north and SHF017 which were located around the A4169. This second comprehensive proposal became SHF034 (70 hectares) for Land South of Shifnal around Lodge Hill and Lodge Hill Farm.
- 1.11 SHF034 comprised a joint proposal from Wallace Land Investments (with Preferred Sites Consultation representation 1611 supporting SHF017 north (later discontinued), SHF017 south, P16a, P17a) and Miller Homes (with Preferred Sites Consultation representation 1262 supporting SHF019 and P15b West). SHF034 proposed housing development only on greenfield land in the Green Belt.
- 1.12 All other sites remained as single, smaller site proposals comprising a mixture of mainly: urban greenfield sites; or existing safeguarded greenfield land identified in a previous Local Plan; or greenfield land within the Green Belt. In addition, there were a smaller number of 'brownfield' previously developed sites in the urban area of Shifnal.
- 1.13 These two comprehensive proposals of SHF018b & SHF018d (39 hectares) and SHF034 (70 hectares) and the smaller site options,

were considered in the site assessment and informed the Preferred Sites Consultation.

- 1.14 In response to the Preferred Sites Consultation, representation 1306 identified a third comprehensive site proposal to the south of SHF018d. This was located across the Shrewsbury – Wolverhampton rail line from SHF018d, to the west and east of the southern leg of Upton Lane and extending into the Green Belt along the A464.
- 1.15 This third comprehensive proposal was SHF035 Land at Upton Lane (46ha), otherwise known as the 'Nurton Development'. This 'Nurton Development' proposed greenfield land in the Green Belt only for housing development. SHF035 was also assessed during the preparation of the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan (EV007.01)
- 1.16 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).
- 1.17 Stages 2a, 2b and 3 of the site assessment process are 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 for Shifnal is summarised in Appendix 8 of the additional Sustainability Appraisal (GC44).
- 1.18 Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.19 Stage 2b of the site assessment process was a screening exercise which considered the availability; size and strategic suitability of the site. 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 those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
  - b. *Availability:* Sites were 'filtered out' of the site assessment process where uncertainty remained 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 were considered to show the site was unsuitable for development.

- 1.20 Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.21 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 (SD006.17), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), 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.
- 1.22 For the avoidance of doubt, the stage 3 site assessment process included consideration of whether a site is located within the Green Belt. Where it was located in the Green Belt, the assessment considered the harm that would result from releasing the site from the Green Belt, alternative development options and whether exceptional circumstances existed.
- 1.23 To inform the identification of sites to accommodate proposed contributions to the Black Country, a similar site assessment process was undertaken. This identified and considered the geography within which reasonable options to accommodate these contributions would be located. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 1.24 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 Shifnal Place Plan area, although this only comprises Shifnal town and its Green Belt setting because there are no other development locations identified in the Shifnal Place Plan area.
- 1.25 These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of the planning application register, and consideration of land owned by the public sector.

- 1.26 Within Stages 2a and 2b of the site assessment process, around 38 sites were considered at Shifnal. Within Stage 3 of the site assessment process, around 29 sites were considered at Shifnal.
- 1.27 SHF018b & SHF018d were proactively promoted for employment development during the plan-making process and ultimately identified as the proposed employment allocation for Shifnal through the site assessment process. Shropshire Council were presented with only a few site options for employment development that were suitable, available and deliverable. Most of these site options were limited by the scale of the site.
- 1.28 Proposals for SHF018b & SHF018d 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. SHF018b & SHF018d were confirmed as the proposed employment allocation for Shifnal, within the submission version of the draft Shropshire Local Plan (SD002).
- 1.29 Two Statements of Common Ground (SoCG10 and the update in SoCG11) have been completed between Shropshire Council and the site promoter, providing further information in support of this combined site.
- 1.30 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of SHF018b & SHF018d as the proposed employment allocation. These objections are summarised in SD014.01 and GC4o. They included:
- a. Shropshire Council has failed to engage the Town Council and the local community in the strategy for Shifnal and have not recognised the objectives of the Shifnal Neighbourhood Plan.  
Shropshire Council undertook five separate consultations during the preparation of the Regulation 18 Pre-Submission Draft Local Plan which included proactive engagement with Town and Parish Councils. The evidence base for the Draft Local Plan also includes the Place Plans (focusing on local infrastructure needs) which are informed by proactive engagement with Town and Parish Councils.  
Neighbourhood Plans are required to conform with the strategy in the adopted Local Plan but the Local Plan recognises the objectives that were identified by the local community. The Local Plan seeks to deliver an approach that pays due regard to these local objectives.
  - b. Shropshire Council has failed to properly assess the existing employment land supply in Shifnal and released an excessive 39ha employment land allocation at SHF018b and SHF018d.



The existing employment land supply in the County and in each Place Plan area has been identified in the Authority Monitoring Report (20200 ( EV012). This employment land supply information also informed the evidence provided in the Economic Development Needs Assessment (GC043).

The employment land supply position in the County has also been assessed and discussed in detail in the Employment Requirement Topic Paper (EV112) in Table 7 (page 18) and Tables 10 and 11 (page 24) and in the Employment Strategy Topic Paper (GC4n) at Table 4 (page 13) for the County, east Shropshire and Shifnal.

Employment k]land provision seeks to meet the neds of Shifnal where there are no suitable employment development opportunities and to contribute towards unmet employment land needs in the Black Country.

- c. Shropshire Council has failed to demonstrate exceptional circumstances for the release of land from the Green Belt especially for site SHF018b and SHF018d.

Shropshire Council considers that the site assessment process undertaken to inform the identification of sites to accommodate proposed contributions to the Black Country considered all other reasonable site options. This site assessment process fully justifies the identification of SHF018b and SHF018d as a proposed employment land allocation and the assessment has been unambiguously summarised and the conclusions reached have been explained.

The exceptional circumstances are demonstrated for the release of this site from the Green Belt and for accommodating the proposed contribution to the Black Country on part of SHF018b and SHF018d. This is explained in the Green Belt Revised Exceptional Circumstances Statement (EV051). This is summarised in the Green Belt Topic Paper (GC4g) which also appraises the Green Belt Assessment (EV049) and the Green Belt Review (EV050.01).

The Council would note, a distinction should be made between a lack of consideration of alternative sites or exceptional circumstances and any disagreement about the outcomes of these processes.

- d. Reduce the level of growth in Shifnal by removing the employment land allocation for 39ha from SHF08b and SHF018d and retain both sites in the Green Belt or alternatively safeguard only SHF018b. Remove SHF18a and P14a from the Green Belt and allocate these two sites as a 16ha employment land allocation to reduce harm to the Green Belt.

- i. Shropshire Council refer to the justification for exceptional circumstances to release site SHF018b and SHF018d from the Green Belt under point (a) above.
  - ii. The combination of sites SHF018b (4.47 hectares) and SHF018d (14.47 hectares) would amount to only 18.9 hectares which would limit the capacity of the development to deliver the necessary strategic infrastructure for a significant new employment area.
  - iii. The combination of sites SHF018b and SHF018d would also make only a partial contribution to unmet needs in the Black Country and only a limited contribution to employment needs in Shifnal.
- e. SHF018b and SHF018d will only meet local employment needs due to distance between the site and the M54.
- i. Shifnal is the largest Key Centre in Shropshire in a sustainable location on the M54 road and rail corridor with a strong functional relationship with the Black Country;
  - ii. The proposed 39ha employment land allocation on SHF018b/018d in East Shifnal is capable of meeting the entire 30ha contribution from Shropshire towards the Black Country unmet employment land need;
  - iii. SHF018b/018d in East Shifnal is also capable of meeting local employment land needs through the development of a further 9ha in Shifnal and east Shropshire.
  - iv. This is identified in Main Modification MM109 (GC4m) which states *"Due to the size and location of this site it will form a locally and regionally significant employment site, contributing to meeting local needs and accommodating a 30ha contribution towards unmet employment land needs forecast to arise in the Black Country."*
- f. Objections to the site guidelines for SHF08b and SHF018d sought to permit buildings of 2 or more storeys; to remove the need for a link to Shifnal Industrial Estate; to remove the requirement for sustainable routes along Stanton Road and Upton Lane and to remove the requirement for highway improvements along Stanton Road.
- i. Detailed development guidelines within Schedule S15.1(ii) of draft Policy S15.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site.
  - ii. The development guidelines intend that the employment land allocation will deliver a high quality, campus style development primarily for Class B uses with appropriate secondary employment uses and other ancillary service uses.

- iii. Development is expected to meet its infrastructure requirements and to mitigate for its impacts on existing infrastructure and the locality around the development site.
- iv. Where the provisions of the development guidelines are considered to be inappropriate, then evidence may be submitted with any planning application for consideration by the Council, its partner organisations and other stakeholders including the Town Council and local community.
- g. Identify a shorter delivery timeframe for SHF018b and SHF018d in draft Plan Appendix 7.
  - i. The current delivery timeframe for SHF018b and SHF018d in draft Plan Appendix 7 reflects the scale of the site and the significant requirement for infrastructure investment to access and service the site.
  - ii. Shropshire Council would welcome an early delivery of development on SHF018b and SHF018d to meet local employment needs and to contribute towards unmet employment land needs in the Black Country.
  - iii. Shropshire Council considers the proposed delivery timeframe to be both realistic and deliverable and this is now supported in SoCG11 paragraph 1.7.
- h. Local highway constraint at the junction of Bradford Street and Aston Street leading towards Stanton Road which will serve SHF018b and SHF018d is a significant constraint on the development of this employment land allocation.
  - i. Shropshire Council considers the site assessment process included appropriate consideration of all potential constraints to development of the site. This site assessment process fully justifies the identification of SHF018b and SHF018d as a proposed allocation.
  - ii. A Strategic Transport Assessment and other highway assessments will be required during the detailed planning of the development of SHF018b and SHF018d.
  - iii. Detailed evidence for the development of SHF018b and SHF018d will also be the subject of public consultation through the development management process.
- i. Ensure groundwater protection measures in north-west corner of SHF018b and SHF018d will protect the Source Protection Zone.
  - i. Shropshire Council considers the site assessment process included appropriate consideration of all potential constraints to development of the site.
  - ii. This site assessment process fully justifies the identification of SHF018b and SHF018d as a proposed allocation and the

strategy and policies of the Local Plan will ensure appropriate mitigation of any site constraints.

- iii. Of particular relevance are draft Policy DP25 which addresses the provision of infrastructure; Draft Policies SP5 and SP6 which address high-quality design and health and wellbeing and Draft Policies DP12 – DP24 which address the natural and historic environment.
  - iv. It is proposed that the development scheme will include a stand-off and buffer to the SPZ in Zone 1 in the north-west corner of the site on SHF018b.
- 1.31 Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation also included support and objection to the site assessment process which identified SHF018b & SHF018d as an appropriate location to accommodate part of the proposed contribution to the unmet employment need forecast to arise in the Black Country. These responses are summarised in GC52.
- 1.32 Reasons for objections were often similar to those addressed in paragraph 1.16 of this response. Other reasons for objections included:
- a. Shropshire Council has again failed to demonstrate exceptional circumstances for the release of site SHF018b and SHF018d from the Green Belt.
    - i. Shropshire Council considers the site assessment process undertaken to inform the identification of sites to accommodate proposed contributions to the Black Country considered all other reasonable site options.
    - ii. This site assessment process fully justifies identification of SHF018b and SHF018d as a proposed employment land allocation and the assessment has been unambiguously summarised and the conclusions reached have been explained.
    - iii. The exceptional circumstances have been demonstrated to release this site from the Green Belt and for accommodating the proposed contribution to the Black Country on part of SHF018b and SHF018d. This is explained in the Green Belt Revised Exceptional Circumstances Statement (EV051). This is summarised in the Green Belt Topic Paper (GC4g) which also appraises the Green Belt Assessment (EV049) and the Green Belt Review (EV050.01).
    - iv. The Council would note, a distinction should be made between a lack of consideration of alternative sites or exceptional circumstances and any disagreement about the outcomes of these processes.

- b. Shropshire Council cannot de-allocate SHF018b and SHF018d from the objective to meet Shropshire needs and re-allocate SHF018b and SHF018d for unmet needs in the Black Country.
  - i. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process.
  - ii. The assessment process included identification of an appropriate assessment geography, informed by a range of factors including geographic proximity, location and connectivity, migration and commuting patterns, and travel to work areas.
  - iii. The assessments unambiguously documents the process undertaken and explains the conclusions reached.
  - iv. The Council considers the site assessment process fully justifies identification of SHF018b and SHF018d as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
    - Shifnal is the largest Key Centre in Shropshire in a sustainable location on the M54 road and rail corridor with a strong functional relationship with the Black Country.
    - The proposed 39ha employment land allocation on SHF018b/018d in East Shifnal is capable of meeting the entire 30ha contribution from Shropshire towards the Black Country unmet employment land need.
    - SHF018b/018d in East Shifnal is also capable of meeting local employment land needs through the development of a further 9ha in Shifnal and east Shropshire.
    - These objectives would not be achieved through the combination of sites SSHF018a and SHF018b.
- c. Shropshire Council should allocate alternative sites to SHF018b & SHF018d for unmet needs in the Black Country using land outside the Green Belt or with less harm to the Green Belt.
  - i. Shropshire Council refer to the justification for exceptional circumstances to release site SHF018b and SHF018d from the Green Belt.
- d. Shropshire Council should explain how 30ha for unmet need in the Back Country will be delivered on a 39ha site with a net developable area of 15.6ha.
  - i. The proposed 39ha employment land allocation on SHF018b & SHF018d in East Shifnal is capable of meeting the entire 30ha contribution from Shropshire towards the Black Country unmet employment land need. SHF018b & SHF018d in East Shifnal is

also capable of meeting local employment land needs for a further 9ha in Shifnal and east Shropshire.

- e. Shropshire Council should explain the purpose of the net developable area of SHF018b and SHF018d.
  - i. The net developable area of 15.6ha is the total area of the site expected to accommodate buildings and other operational space including loading/unloading areas and storage of materials and products. The remainder of the site is expected to accommodate accesses, highways, servicing and circulation areas and Green and Blue infrastructure.

1.33 In conclusion, Shropshire Council considers that SHF018b & SHF018d was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 8 of GC44.

1.34 Shropshire Council also considers that identification of SHF018b & SHF018d as a location to accommodate the proposed contribution to the unmet employment land need forecast to arise in the Black Country was informed by a proportionate and robust site assessment process. This process considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This process and the conclusions reached are unambiguously summarised within Chapter 12 and Appendices 1-10 of GC44.

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

**Shropshire Council Response:**

- 2.1. SHF018b & SHF018d are proposed to be allocated as an extension to the existing Shifnal Industrial Estate and when marketed will be known as 'S54' on the eastern edge of Shifnal which is designated as a Key Centre.
- 2.2. This site comprises 39ha of greenfield land situated in the Green Belt around Shifnal and the release of this land is expected to deliver 15.6ha (40%) of built employment development and provide a new permanent and strengthened Green Belt boundary.
- 2.3. Detailed development guidelines within Schedule S15.1(ii) of draft Policy S15.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site.

- 2.4. The specific employment generating uses on the site will be particularly influenced by draft Policies SP1; SP2; SP13 and SP14 and the employment uses should principally be within the primary use classes of B2, B8, E(g) and appropriate sui generis uses.
- 2.5. The development guidelines indicate the employment land will create a high quality, campus style development primarily for Class B uses but with appropriate secondary employment uses and other ancillary service uses where the need and demand for these uses are justified.
- 2.6. Situated on the edge of town, the development will take full account of the need to enclose both the built form of the development and any off-site infrastructure works within a Green and Blue Infrastructure network, separating it from the Green Belt and the open landscape to the east of Shifnal.

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

**Shropshire Council Response:**

- 3.1. The proposed scale, type and mix of employment uses and the associated development guidelines within Schedule S15.1(ii) of draft Policy S15.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of SHF018b & SHF018d.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter. Two Statements of Common Ground (SoCG10 and the update in SoCG11) have been completed between Shropshire Council and the site promoter, providing further information in support of this combined site.
- 3.3. Representation A139 to the Post Stage 1 Interim Findings Consultation also included support for SHF018b & SHF018d in a statement prepared by the development partner. This statement briefly identifies that the development site is of a sufficient size to offer a range of unit sizes to the market, from 'move on' spaces for local businesses, to attracting new investment from companies requiring larger spaces not available within the Back Country or Shifnal area.
- 3.4. 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. SHF018b & SHF018d is currently the subject of discussions between the Council and the site promoter which have been presented in the SoCG10 and SoCG11. These discussions indicate an intention by the development partner to submit an early application for the development on SHF018b & SHF018d following the adoption of the Local Plan.

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

**Shropshire Council Response:**

- 5.1. SHF018b & SHF018d is a proposed employment land allocation for 39 hectares with a proposed developable area for buildings and operational space of 15.6 hectares. The employment development should create a high quality, campus style development primarily for Class B uses and constitute the proposed contribution towards the unmet employment land need forecast to arise in the Black Country. This will leave the residual area of the site to meet local employment needs in Shifnal and Shropshire.
- 5.2. Situated on the eastern edge of Shifnal, the development will take full account of the need to enclose both the built form of the development and any off-site infrastructure works within a Green Infrastructure Network, separating it from the Green Belt and landscape to the east of Shifnal.
- 5.3. As such, key benefits of the proposed development include:
  - a. provision of new, high quality, greenfield employment land which will significantly enhance the investment potential of Shifnal by improving the employment land offer in the town.
  - b. delivery of modern commercial premises to accommodate a much broader business representation in Shifnal and higher quality employment primarily in Class B and Class E(g) uses.
  - c. extending the urban environment through the provision of a high quality, campus style development with a focus on site character, quality, density, design, layout, landscaping and building heights.
  - d. Delivery of key utilities and service infrastructure as part of the development with off-site highway improvements and enhancements to public transport services and public realm.
  - e. Creation of an effective and permanent Green Belt boundary supported by a Green and Blue Infrastructure Network with SuDS and a 'parkland' character linking to adjacent woodlands.



- 5.4. Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Shifnal and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of SHF018b and SHF018d and the wider draft policies in the draft Shropshire Local Plan.
- 5.5. The site location, along with the proposed policy framework, will effectively ensure the development integrates with and complements the existing built form of the town including the existing employment area of Shifnal Industrial Estate.
- 5.6. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. Green Belt boundary around the north, east and south of SHF018b and SHF08d will be strengthened to create an effective and permanent site boundary with the rail line forming the southern boundary.
  - b. Green Infrastructure including a SuDS network will be designed and landscaped with strong native planting to create a 'parkland' character linking with adjacent woodlands to:
    - i. Enclose both the built form of the development and any off-site infrastructure works within a Green and Blue Infrastructure Network, separating it from the Green Belt and landscape to the east of Shifnal.
    - ii. Provide public access to the Green Belt as a compensatory provision for releasing SHF018b and SHF08d land from the Green Belt.
    - iii. Provide a strong boundary to the Green Belt on the north, east and south of the site along with the adjoining woodland.
  - c. Site design, layout, height of buildings, Green Infrastructure will respond to any identified landscape and visual effects with appropriate mitigation to consider:
    - i. Using strong native tree planting to provide appropriate and substantial buffering.
    - ii. Effective building design and materials to appropriately manage impacts from the development.

- d. A multi-stage, sustainable drainage system and water treatment facilities will be informed by a sustainable drainage strategy which will:
  - i. Protect the River Worfe catchment and drainage network from excessive discharge flows with flood and water quality management measures.
  - ii. Protect the core of the Source Protection Zone and pumping station on Stanton Road with a stand-off for built development to the SPZ1 in the north-west of the site with principal drainage flows into the south and east of the site onto land accessible to the River Worfe catchment.
  - iii. Any residual surface water flood risk will be managed by excluding built development from the affected areas of the site.
- e. Heritage assets and their settings will be protected through the site design, layout and green infrastructure network. The potential for archaeological deposits will be recorded with the historic thoroughfare of Upton Lane preserved.
- f. Natural environment assets including priority habitats in proximity to the site will be safeguarded and buffered. The Green Infrastructure network with structural planting for the employment area will preserve historic field patterns and retain or replace trees and hedgerows as part of the grain of the development.
- g. SHF018b and SHF018d will significantly enhance the investment potential of Shifnal by improving the employment land offer, commercial premises, business representation and employment in Shifnal.
- h. The development of this site will be in accordance with a masterplan and design code to:
  - i. Be a significant material planning consideration for any planning application for the development of the site.
  - ii. Create a high quality, campus style development primarily for Class B uses but with appropriate secondary employment uses and other ancillary service uses.
  - iii. Focus on site character, quality, uses, density, design, layout, building heights and materials.
  - iv. Manage impacts from the development including visual impacts, noise, dust, odour or other emissions arising from the employment uses.

- i. Key utilities and service infrastructure will be delivered as part of the development including:
  - i. An electricity upgrade to an appropriate MVA to serve the existing and proposed employment areas in the east of the town.
  - ii. The possibility of renewable energy to meet the energy needs of the business occupiers.
- j. Highway infrastructure should service the site from the A41/M54 Junction 3 along Stanton Road as the primary access and requiring improvements to Stanton Road. Traffic restrictions on commercial vehicle movements through the A464 / Aston Street in Shifnal will protect the town centre.
- k. Strategic Transport Assessment and evidence will assess:
  - i. The effects of the development and the cumulative growth of Shifnal on the local and strategic road network, including M54 Junction 3 and the A41/Stanton Road junction, this will be informed by consultation with Highways England.
  - ii. Sites SHF18b and SHF18d will share a principal access from Stanton Road and a primary distributor road along Upton Lane which will be improved to the southern viaduct bridge.
  - iii. Significant and effective pedestrian and cycle links will be provided along Stanton Road, into and through the development to encourage safe and sustainable patterns of movement between the employment area and the town.
  - iv. All necessary improvements to the local and strategic road network will be undertaken as part of the development. It is recognised in the Statement of Common Ground (SoCG11) with the site promoter and their development partner that *"Initial investigative work...in relation to the Stanton Road / Newport Road junction ... confirms ... improvements to the junction ... can be accommodated, within the highway boundary. Notwithstanding the highway interventions required at the Upton Lane / Stanton Road junction, these can be achieved through a more detailed analysis at the master-planning stage."*
- l. Upton Lane forms an historic thoroughfare and the road route or its historical presence will need to be conserved in the development. This will also become the primary distributor road for the development and will:
  - i. Be closed to vehicular traffic at its southern viaduct bridge until Upton Lane (south) is improved and recognising the bridge weight restriction over the viaduct for commercial traffic.

- ii. Remain open to pedestrian and cyclist movements for active travel through Upton Lane (south) and Lamledge Lane.
  - iii. Recognise the functional relationship with Shifnal Industrial Estate to the west of Upton Lane providing:
    - Links between the two employment areas and create a secondary access into the new employment area with pedestrian and cycling access and possible vehicular from the south.
    - Alleviate the constraints imposed on Shifnal Industrial Estate from the intensity of the existing uses.
  - m. Public transport links by bus and including a peak time or demand responsive bus connection will be provided linking the site to Shifnal town. Parking facilities on site will provide electric vehicle charging points.
- 5.7. More generally, it is also considered that development of SHF018b and SHF018d will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire. It will also support the ability of the Black Country to meet their employment land need and provide employment for the growing labour supply within their administrative areas.

**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 SHF018b & SHF018d 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 SHF018b & SHF018d.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF018b & SHF018d constituted an appropriate proposed mixed-use 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 SHF018b & SHF018d within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The Green Belt Assessment and Review undertaken for Shropshire indicates that:
    - i. SHF018b is located within Green Belt parcel where the land performs moderately against purpose 2; moderately against purpose 3; and weakly against purpose 4.
  - b. SHF018b is located within a Green Belt parcel where the release of the land would have a moderate-high level of harm on the Green Belt due to the level of encroachment on countryside and the weakening of the role of adjoining areas with regard to purposes 2 and 3.
    - i. SHF018d is located within Green Belt parcel where the land performs moderately against purpose 2; strongly against purpose 3; but makes no contribution to purpose 4.
    - ii. SHF018d is located within a Green Belt parcel where the release of the land would have a high level of harm on the Green Belt if released for development, due to the level of encroachment on countryside and the weakening of the role of adjoining areas with regard to purpose 3.
    - iii. No sub-parcels were identified in SHF018b or SHF018d where there would be less harm to the Green Belt from the release of the land.
    - iv. Site guidelines require the following:
      - A strong and permanent Green Belt boundary around the north, east and south of SHF018b and SHF08d to create an effective and permanent site boundary with the rail line forming the southern boundary.
      - Green Infrastructure including a SuDS network will be designed and landscaped with strong native planting to create a 'parkland' character linking with adjacent woodlands to enclose both the built form of the development and any off-site infrastructure works within a Green and Blue Infrastructure Network, separating it from the Green Belt and landscape to the east of Shifnal.
      - Provide public access to the Green Belt as a compensatory provision for releasing SHF018b and SHF08d land from the Green Belt.
        - o A Water Irrigation Storage Reservoir has been developed on the eastern boundary of the site. This provides storage for water abstracted during winter discharges from the Neachley Brook. This new development should be incorporated into the new Green Belt boundary linking with the Green and Blue Infrastructure Network.

- c. Principal access will be from Stanton Road through a shared main road junction and gateway feature. This should control traffic impacts on key junctions and routes in the town centres. Site guidelines require the following:
  - i. Strategic Transport Assessment should investigate the effects of the development and the cumulative growth of Shifnal on the local and strategic road network, including M54 Junction 3 and the A41/Stanton Road junction, this will be informed by consultation with Highways England.
  - ii. All necessary improvements to the local and strategic road network will be undertaken as part of the development.
  - iii. Highway infrastructure should service the site from the A41/M54 Junction 3 along Stanton Road as the primary access and requiring improvements to Stanton Road particularly with a redesign of the A41/Stanton Road junction north of the M54 Junction 3.
  - iv. Traffic restrictions on commercial vehicle movements through the A464 / Aston Street in Shifnal will protect the town centre.
  - v. Sites SHF18b and SHF18d will share a principal access from Stanton Road and a primary distributor road along Upton Lane which will be improved to the southern viaduct bridge.
  - vi. Significant and effective pedestrian and cycle links will be provided along Stanton Road, into and through the development to encourage safe and sustainable patterns of movement between the employment area and the town.
- d. Shifnal Industrial Estate will have a functional relationship with SHF018b to the west of Upton Lane. Site guidelines require a response to the constraints within Shifnal Industrial Estate from the intensity of the existing uses. This should include provision of pedestrian and cycling possibly with a secondary vehicular access between the two employment areas.
- e. SHF018b & SHF108d are in the surface water flood risk zones for severe conditions. The north-west corner of SHF018b lies over a Source Protection Zone with the SPZ1 and pumping station located off Stanton Road. Site guidelines require.... a stand-off for built development with the possibility of principal drainage flows passing into the south of SHF018b and to the east of SHF018d.
  - i. A multi-stage, sustainable drainage system and water treatment facilities will be informed by a sustainable drainage strategy which will protect the River Worfe catchment and drainage network from excessive discharge flows with flood and water quality management measures.
  - ii. Protection of the core of the Source Protection Zone and pumping station on Stanton Road with a stand-off for built

development to the SPZ1 in the north-west of the site with principal drainage flows into the south and east of the site onto land accessible to the River Worfe catchment.

- iii. Provision to ensure any residual surface water flood risk will be managed by excluding built development from the affected areas of the site.
- f. SHF018b comprises an environmental network corridor and habitats adjacent to the west will need to be appropriately buffered. SHF018d comprises ... Site guidelines require a Green Infrastructure Network that responds to any identified landscape and visual effects with appropriate mitigation to consider using strong native tree planting to provide appropriate and substantial buffering, effective building design and materials to appropriately manage impacts from the development.
- g. The mature trees, hedgerows and woodland within or around SHF018b & SHF018d. Site guidelines require Natural environment assets including priority habitats in proximity to the site to be safeguarded and buffered. The Green Infrastructure network with structural planting for the employment area will preserve historic field patterns and retain or replace trees and hedgerows as part of the grain of the development.
- h. There is no known archaeological interest on SHF018b & SHF018d but this extensive site should be investigated for archaeological potential. Site guidelines require heritage assets and their settings to be protected through the site design, layout and green infrastructure network. The potential for archaeological deposits will be recorded and the historic thoroughfare of Upton Lane will be preserved.
- i. In the context of employment development, the site is deemed to have medium-high landscape and visual sensitivity for both SHF018b and SHF018d. The site guidelines require create a high quality, campus style development primarily for Class B uses but with appropriate secondary employment uses and other ancillary service uses The site design will focus on focus on site character, quality, uses, density, design, layout, building heights and materials. The development scheme will manage impacts from the land uses including visual impacts, noise, dust, odour or other emissions arising from the employment uses.
- j. Noise associated with the local highway and rail line to the south on SHF018d. The proposed uses and urban environment within the proposed new employment area are not expected to be receptive to these impacts which will be mitigated by the proposed landscaping and the effect of the Green Infrastructure Network around the boundary of the site.

- k. SHF018b & SHF108d are located within a mineral safeguarding area. This has been appropriately considered within the site assessment process.
- l. Applying the precautionary principle, SHF018b & SHF108d consists of best and most versatile agricultural land. 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 which informs 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) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation SHF018b & SHF018d provides further information on the site assessment process.
- 7.4. In summary, the flood risk at SHF018b & SHF018d recognises a limited fluvial flood risk to the proposed allocation, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. The flood risk recognises:
  - a. Around 1% of SHF018b and SHF018d lie within the 100 year surface flood risk zone.
  - b. Around 2% of SHF018b and SHF018d lie within the 1,000 year surface flood risk zone which would limit development on the site.
- 7.5. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths. These measures would manage surface water flood risks during severe conditions.
- 7.6. The proposed site guidelines for SHF018b & SHF018d within Schedule S15.1(ii) of draft Policy S15.1 address site specific flood risk issues, stating: *"The allocation lies over a Source Protection Zone with its core area over the pumping station on Stanton Road to the north-west. A stand off for built development will protect the*



*SPZ1 area and the site may be required to drain to the south and east onto land accessible to the River Worfe catchment. The site will incorporate a multi-stage sustainable drainage system and water treatment facilities, informed by a sustainable drainage strategy. Water runoff will be restricted to the equivalent greenfield rate and water quality in the wider drainage network will be protected. Any residual surface water flood risk will be managed by excluding built development from the affected areas of the site. Flood and water management measures must not displace water elsewhere."*

- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation SHF018b & SHF018d passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application.

**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 SHF018b & SHF018d 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 SHF018b & SHF018d.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF018b & SHF018d constituted an appropriate proposed employment allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for SHF018b & SHF018d within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic

Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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. Shropshire Council expects infrastructure requirements and identified constraints to be addressed through the design and construction of the development and through developer contributions associated with the development.
- b. Highway infrastructure should service the site from the A41/M54 Junction 3 along Stanton Road as the primary access route. This will require improvements to Stanton Road particularly with a redesign of the A41/Stanton Road junction north of the M54 Junction 3.
- c. Sites SHF18b and SHF18d will share a principal access from Stanton Road and a primary distributor road along Upton Lane which will be improved to the southern viaduct bridge over the rail line.
- d. Upton Lane forms an historic thoroughfare and the road route or its historical presence will need to be conserved in the development.
- e. Upton Lane will therefore form the primary distributor road for the development of both SHF018b & SHF018d and will be a key physical feature of the employment area. Upton Lane will be closed to vehicular traffic at its southern viaduct bridge until Upton Lane (south) is improved. This will recognise the bridge weight restriction over the viaduct especially for commercial traffic.
- f. Upton Lane (south) will remain open to pedestrian and cyclist movements for active travel across the viaduct bridge to the A464 or through the Lamledge Lane 'return' into town.
- g. Significant and effective pedestrian and cycle links will be provided along Stanton Road and onto Upton Lane and through the development to encourage safe and sustainable patterns of movement between the employment area and the town and connecting with the existing Shifnal Industrial Estate.
- h. All necessary improvements to the local and strategic road network will be undertaken as part of the development.
- i. Public transport links by bus and including a peak time or demand responsive transport connection will be provided linking the site to Shifnal town. Parking facilities on site will provide electric vehicle charging points.

- j. Shifnal Industrial Estate to the west of Upton Lane and SHF018b will form part of the highway and footway network creating a secondary vehicular access with pedestrian and cycling links through the existing Industrial Estate.
  - k. The existing Industrial Estate should be buffered by a stand-off within the new development as part of the layout and design to alleviate the density within the existing Industrial Estate.
  - l. Key utilities and service infrastructure will be delivered including an electricity upgrade to an appropriate MVA to serve the existing and proposed employment areas in the east of the town.
  - m. Green Belt boundary around the north, east and south of SHF018b and SHF08d will be strengthened to create an effective and permanent site boundary.
  - n. Green Infrastructure including a SuDS network will be designed and landscaped with strong native planting to create a 'parkland' character linking with adjacent woodlands and the new Water Irrigation Storage Reservoir on the eastern boundary of SHF018d.
  - o. A multi-stage, sustainable drainage system with water treatment facilities will be informed by a sustainable drainage strategy that discharges to the River Worfe catchment with appropriate water quality management measures.
  - p. Natural environmental assets including priority habitats in proximity to the site will be safeguarded and buffered.
- 8.6 The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHF018b & SHF018d. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.7 Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that "*new development should only take place where there is sufficient existing infrastructure capacity available...*" or where "*...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means.*" It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.8 Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.

- c. Policies DP12 – DP24 which address the natural and historic environment.
- d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

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

**Shropshire Council Response:**

- 9.1 Yes. Shropshire Council considers site SHF018b and SHF018d is realistically viable and deliverable.
- 9.2 The level of development proposed within Shifnal is considered to positively respond to the role and function of the town within the settlement hierarchy, the importance of ensuring the longer term vitality and sustainability of this community and the strategic significance of the town in the functional relationship between Shropshire and the Black Country Authorities.
- 9.3 The focus on SHF018b and SHF018d provides greater confidence about the deliverability of development to assist the Black Country and the attraction of demand from the significant urban centres in these four urban authority areas.
- 9.4 This confidence is strengthened by the statements provided in Harrow Estates representation (A139) to the Council's Response to Inspectors Documents ID36-ID37. Harrow Estates as the site promoter has stated:
  - a. Any proposal to meet the unmet need of the Black Country would need to be provided on a specific site or sites. The identification of 39 hectares of land east of Shifnal Industrial Estate is an appropriate and justified approach which will meet not only locally arising need but also those from the Black Country.
  - b. Shifnal is strategically located in east Shropshire and as a large town can accommodate additional employment development. It is in close proximity to two strategic corridors and accessible via road and rail links to Shrewsbury and Shropshire to the west and to the Black Country to the east.
  - c. Land east of Shifnal Industrial Estate is suitable, available and deliverable to meet the requirements of the draft Local Plan and the needs identified within the supporting evidence base.
- 9.5 The Harrow Estates representation (A139) also provides a Shifnal Delivery Statement prepared by their development partner Stoford. This responds to the consultation proposing sites SHF018b and SHF018d as the preferred location to meet the unmet employment

land needs of the Black Country Authorities. Stoford as the development partner has stated:

- a. Shifnal provides a centrally located site within a market where Stoford have considerable experience of delivery.
- b. Strategic corridors through Shropshire and strategic links to Shifnal offer key road and rail connections with the Black Country.
- c. Shifnal offers a source of labour, and locating adjacent to the settlement will provide local job opportunities which are available to people on 'active travel' routes for their journey to work.
- d. Shifnal provides a range of local services and facilities, which enhance the sustainability of Shifnal as a location for growth.
- e. The development site is of a sufficient size to offer a range of unit sizes to the market, from 'move on' spaces for local businesses, to new inward investment opportunities for companies seeking larger spaces not currently available in the Black Country or Shifnal.
- f. The scale of the allocation, at 39 hectares lends the development to highway improvements particularly at the A41/Stanton Road junction feeding Junction 3 of the M54.
- g. Stoford are considering preparing an outline planning application to secure the principles of development and details of access, to offer confidence in the delivery timescales.
- h. Stoford are engaging with initial expressions of interest for buildings from 30,000sq ft (2,800sqm) to 250,000 sq ft (23,230sqm).

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

**Shropshire Council Response:**

- 10.1. The expected timescale on proposed allocation SHF018b and SHF018d is summarised in Appendix 7 of the draft Local Plan.
- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue beyond 2038. In proposing this employment allocation, the Council anticipates the delivery of the significant infrastructure investments to establish the site will require a significant lead in time. The timescale for the completion of the site reflects this and cautious expectations on the rate of investment demand for built floorspace on this high quality, accessible site.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable and this is supported in

SoCG11 paragraph 1.7. However, the circumstances that justify the release of this site both to meet Shropshire's needs and to support unmet need in the Black Country indicate reasons for an earlier delivery of development on SHF018b and SHF018d.

- 10.4. In the period since 2016, Shropshire is experiencing higher rates of employment development identified in the Authority Monitoring Report (2020) (EV012) which was prepared after the identification of SHF018b and SHF018d in 2018.
- 10.5. Further, there is a recognised shortfall in employment land across the West Midlands including within the Black Country which this allocation seeks to assist. The scale of provision at 39ha, the delivery of high quality modern commercial floorspace, the involvement of a market leading development partner, are likely to encourage an earlier delivery of SHF018b and SHF018d.
- 10.6. Two Statements of Common Ground (SoCG10 and SoCG11) have been completed between Shropshire Council and the site promoter and latterly with their development partner, which provide further confidence on the viability and deliverability of the site.
- 10.7. Within SoCG11 paragraph 5.1 and 5.1, it is indicated that:

*"Harrow Estates (site promoter) and Ruckley Estates (landowner) with the support of Stoford (development partner), emphasise the availability, suitability and developability of the site and support the inclusion in the Draft Local Plan as an employment allocation by Shropshire Council. All parties agree the sites demonstrate a sustainable, suitable and deliverable location for new employment development.*

*As a readily available site, once the site has been released from the Green Belt upon adoption of the Shropshire Local Plan, the site can be brought forward for delivery. Commercial support for, and interest in, the site assists in demonstrating that this allocation meets the locational needs of a broad range of investment demands."*

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

**Shropshire Council Response:**

- 11.1. The boundary proposed for SHF018b & SHF018d was confirmed by the Council in response to the submission from the landowner. This boundary was subsequently informed by initial masterplanning undertaken by the site promoter. This formed part of the material prepared in support of the site. This material was duly considered by the Council through its continuing site assessment process.

- 11.2. The site boundary to SHF018b & SHF018d is a key feature of the employment land allocation. The boundary has determined the scale of land made available and will influence the capacity to deliver an efficient density of development through an effective layout and design of the proposed development scheme. This relates in large part to the simple, regular layout of the boundary.
- 11.3. The site boundary to SHF018b and SHF018d proposes a simple, regular layout even though it extends across an extensive, changing topography in a rural landscape. The boundary follows the linear features of the rail line and local highway networks and largely follows agricultural field boundaries to define the site area at 39ha. This regular layout offers greater certainty for the delivery of the net developable area at 15.6 hectares or 40% of the site area.
- 11.4. The west and east boundaries are formed from the landownership boundary to the west and from agricultural field boundaries within the extensive landholding to the east which extends into the Green Belt. This extensive landholding provides the scope for the long term treatment of the Green Belt boundary and for the provision of compensatory measures for releasing land from the Green Belt.
- 11.5. In the Statement of Common Ground (SOCG011) between the Council and the site promoter it was agreed in paragraph 2.6 that *"the development of the site will establish new enduring and defensible boundaries to the Green Belt, in accordance with NPPF para 143(f). This will be planned through a considered master-planning layout, including the provision of a Green and Blue Infrastructure Network around (and through) the site to establish a permanent Green Belt boundary that will endure in the long term."*
- 11.6. The eastern boundary currently comprises a weaker pattern of agricultural field boundaries within the Green Belt. The Statement of Common Ground (SoCG11) with the site promoter and their development partner proposes in paragraph 7.5 to strengthen and enhance this eastern boundary through the detailed master planning. This proposes *"Strengthening of the eastern boundary will provide enclosure from the countryside beyond. This will be complemented by the wider landscape strategy implemented within the site to achieve high quality Green Infrastructure, utilising native trees and shrubs and will echo existing field boundaries and other natural features."*
- 11.7. The Statement of Common Ground (SoCG11) sets out in paragraphs 7.4 and 7.6 how this will be achieved:
- "Parties agree that a structural landscaping strategy and enhancement of the Green and Blue Infrastructure within the site, through enhancement of the existing eastern woodland belts and provision of new SUDs features towards the south-east of SHF018d*

*will establish new defensible and permanent boundaries to the Green Belt. This will also aid in mitigating harm as a result of the sites release from the Green Belt.*

*The strengthened eastern boundary and its green infrastructure links through the site will also function as a permeable network and boundary facilitating pedestrian access for the site employees and the Shifnal community for amenity, leisure and recreation purposes. This provision will serve as a compensatory improvement to the Green Belt providing an enhanced beneficial use of the adjacent Green Belt land. This will create a parkland character within and around the site to help bring the recreational opportunities of the Green Belt closer to the local community as an outcome of the proposed development."*

- 11.8. Shropshire Council regard the recent development of the Water Irrigation Storage Reservoir in the eastern boundary of SHF018d as a further opportunity in the design of the new Green Belt boundary. Currently a stark feature of the agricultural landscape, it offers a second reference point along the boundary in addition to the existing woodland to the east. The reservoir also offers a potential focus for more significant treatment within the new boundary and as a potential access point into the extensive Green Belt landscape.

**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 SHF018b and SHF018d within Schedule S15.1(i) of draft Policy S15.1 are effective, justified and consistent with national policy (subject to main modifications proposed within GC4m).
- 12.2. Shropshire Council also recognises that consistent with the draft site guidelines, the site promoter and their development partner will undertake more comprehensive masterplanning. This will inform the sustainable development of the site and achieve the proposed site guidelines and wider policy requirements. It is also recognised that this process will involve engagement with the community and Shropshire Council.
- 12.3. Shropshire Council considers the 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 SHF018b and SHF018d.



- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); 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 SHF018b & SHF018d – 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 SHF018b & SHF018d.
- 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 SHF018b & SHF018d, 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 local employment, the modernisation of the commercial building stock, the more efficient use of employment land, and the achievement of the proposed employment land requirement for Shropshire - consistent with the aspirations of paragraphs 8, 81, 82 and 84 of the NPPF.
  - b. Promote access to services, facilities and infrastructure - consistent with paragraphs 100, 104-106, 110-113; and 114 of the NPPF.
  - c. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - d. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - e. Achieve well designed places – consistent with paragraphs 126, 127, 130 and 131 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 SHF013. These are summarised in SD014.01 and GC4o.

- 12.9. These objections have been identified in response to Question 1 regarding the proposed allocation of SHF018b & SHF018d. These objections comprised:
- a. Modifications to the site guidelines for SHF08b and SHF018d to permit buildings of 2 or more storeys; to remove the need for a link to Shifnal Industrial Estate; to remove the requirement for sustainable routes along Stanton Road and Upton Lane and to remove the requirement for highway improvements along Stanton Road.
- 12.10. Detailed development guidelines within Schedule S15.1(ii) of draft Policy S15.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site.
- 12.11. The development guidelines intend that the employment land allocation will deliver a high quality, campus style development primarily for Class B uses with appropriate secondary employment uses and other ancillary service uses.
- 12.12. Development is expected to meet its infrastructure requirements and to mitigate for its impacts on existing infrastructure and the locality around the development site.
- 12.13. Where the provisions of the development guidelines are considered to be inappropriate, then evidence may be submitted with any planning application for consideration by the Council, its partner organisations and other stakeholders including the Town Council and local community.

**Questions: Site Allocation SHR060, SHR158 & SHR161 – Land between Mytton Oak Road and Hanwood Road, Shrewsbury – see MM113-115**

**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 west of Shrewsbury and constitutes a new proposed sustainable urban extension to the town. It consists of the majority of the agricultural fields located in the area between Hanwood Road, Mytton Oak Road, the A5 and the existing built form of Shrewsbury.
- 1.2. As a result, the site boundaries are formed by agricultural field boundaries and Mytton Oak Road to the north; property curtilages, including the curtilage of a primary school, and agricultural field boundaries to the east; Hanwood Road to the south; and the A5 and agricultural field boundaries to the west.

- 1.3. To inform the identification of proposed site allocations, including SHR060, SHR158 & SHR161, 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 9 of the additional Sustainability Appraisal (GC44).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.

- 1.9. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury 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 186 sites were considered at Shrewsbury. Within Stage 3 of the site assessment process, around 87 sites were considered at Shrewsbury.
- 1.12. SHR060, SHR158 & SHR161 was proactively promoted for residential use with a small provision of 5 hectares for commercial employment generating uses. This proposal was identified 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 SHR060, SHR158 & SHR161 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 SHR060, SHR158 & SHR161 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
  - a. The large pool on the eastern boundary/within SHR060 should constitute a Local Wildlife Site. Whilst this pool recognised in the wider site assessment, it does not receive negative scoring within

Stage 2a of the site assessment process. Shropshire Council considers the conclusions of Stage 2a of the site assessment process are robust and were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.

- b. Concern about impact on highway infrastructure. Shropshire Council considers that the site assessment process gave appropriate consideration to highway matters, informed by analysis undertaken by Highways Officers. The site assessment summaries unambiguously document the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of SHR060, SHR158 & SHR161 as a proposed allocation.
  - c. Concern about delivery assumptions. SHR060, SHR158 & SHR161 is a large and complex site, so will take many years to be delivered, parts of the site have not yet been marketed / developer options are not in place, and Council assumptions are for delivery to extend beyond the proposed Plan period. Shropshire Council considers that the delivery assumptions for the site are entirely appropriate and have been informed by proactive engagement with the site promoter.
- 1.15. In conclusion, Shropshire Council considers that SHR060, SHR158 & SHR161 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. SHR060, SHR158 & SHR161 is proposed to be allocated as a comprehensive new Sustainable Urban Extension providing mixed residential and commercial development for Shrewsbury which is the Strategic Centre for the County. This site includes 5ha of greenfield land which is proposed to be developed for commercial employment generating uses.
- 2.2. Detailed development guidelines within Schedule S16.1(i) of draft Policy S16.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated employment site. The specific employment generating uses on the site would be particularly influenced by draft Policies SP1; SP2; SP13 and SP14 and the employment uses should principally be within the primary use classes of E(g), B8 and appropriate sui generis uses which are appropriate in residential areas.

- 2.3. The development guidelines indicate the employment land will be provided on a minimum of 5 hectares of employment land, utilizing opportunities associated with the creation of any new Park and Ride facility, and focussing on the delivery of high quality and flexible employment provision, In this way, the employment development will be expected to complement the employment offer in Shrewsbury and contribute towards the objectives of the Shropshire Economic Growth Strategy.

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

**Shropshire Council Response:**

- 3.1. The proposed scale, type and mix of employment generating uses and the associated development guidelines within Schedule S16.1(i) of draft Policy S16.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of SHR060, SHR158 with SHR161.
- 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, with two Statements of Common Ground (SoCG03) having been completed between the two parties.
- 4.2 Significant progress has been made on masterplanning for the site and Shropshire Council understands the site promoter is intending to submit an application on adoption of the Shropshire Local Plan.

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

**Shropshire Council Response:**

- 5.1 SHR060, SHR158 & SHR161 is a proposed mixed-use Sustainable Urban Extension (SUE) allocation for 1,500 dwellings and 5ha of employment land. 300 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 5.2 As such, key benefits of the proposed development include:
  - a. The provision of housing to contribute to meeting the needs of all groups within the town and other communities in the Place Plan area. This includes the need for local employer and key worker housing.
  - b. Supporting the housing needs of the Black Country, through the accommodation of part of the proposed contribution to the unmet housing needs forecast to arise in the Black Country.
  - c. The provision of high quality and flexible employment, providing employment opportunities for residents of the town and other communities in the Place Plan area. This will complement the employment opportunities in Shrewsbury and contribute towards the objectives of the Shropshire Economic Growth Strategy.
- 5.3 Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for the development of SHR060, SHR158 & SHR161 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 Shrewsbury and Shropshire.
- 5.4 The sites location, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.5 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; 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 housing; high quality and flexible employment in an accessible location; a new local centre comprising an appropriate range of neighbourhood shopping facilities; other services and facilities – including education and medical; and extensive areas of green infrastructure and open space. Non-residential development will

form an intrinsic component of the development, occurring alongside and cross-subsidised by housing.

- b. Enhancing existing and providing new green infrastructure corridors through the site, thereby retaining mature trees, hedgerows, priority habitats and public rights of way and contributing to the Shrewsbury Big Town Plan strategy.
  - c. Providing appropriate green infrastructure buffers of environmental networks on the east of the site, thereby contributing to the Shrewsbury Big Town Plan strategy.
  - d. Creation of appropriate accesses to both Hanwood Road and Mytton Oak Road and an associated circular link road sufficient to sustain a bus route, potentially linked to the creation of a new 'Park and Ride' facility to the north of the site.
  - e. Providing necessary improvements to the local and strategic highway network.
  - f. Creating and enhancing pedestrian, cycle and vehicular links to and through the site; and within this area of the town to the town centre.
  - g. Appropriately buffering noise, including from roads on and near site boundaries.
- 5.6 More generally, it is also considered that development SHR060, SHR158 & SHR161 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire. It would also support the ability of the Black Country to meet their housing needs.

**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 SHR060, SHR158 & SHR161 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 SHR060, SHR158 & SHR161.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR060, SHR158 & SHR161 constituted an appropriate proposed residential and commercial 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 SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site



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

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There is a need for a new circular link road, between the existing radial roads of Mytton Oak Road and Hanwood Road, to facilitate public transport movements and improve accessibility by private car. Site guidelines require creation of appropriate accesses to both Hanwood Road and Mytton Oak Road and an associated circular link road sufficient to sustain a bus route, potentially linked to the creation of a new 'Park and Ride' facility to the north of the site.
  - b. The site contains a large pool which is priority habitat, grassland which may be priority habitat, and part of the environmental network. There are scattered field trees and hedgerows present. As such, site guidelines require appropriate green infrastructure buffers of environmental networks on the east of the site and enhancement of existing and provision of new green infrastructure corridors through the site - thereby retaining mature trees, hedgerows, priority habitats and public rights of way. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. Noise associated with roads on and near site boundaries. As such, site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to be used to appropriately manage noise, particularly associated with these sources.
  - d. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this also applies to much of the land around Shrewsbury. This has been appropriately considered within the site assessment.
  - 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. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on White Mere, Sweatmere and Crose Mere and Clarepool Moss (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.1.

- g. The site contains a Grade II listed building (Upper Edgebold farmhouse), other heritage assets and has archaeological potential. As such, site guidelines require the site design and layout to reflect and respect the sites heritage and heritage assets within the wider area. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
- h. A small part of the site is located within a Grade 3 Source Protection Zone. Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in Source Protection Zones.

**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 which informs 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) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation SHR060, SHR158 & SHR161 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at SHR060, SHR158 & SHR161 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. The flood risk also recognises:
  - a. Around 1% of SHR060, 3% of SHR158 and 7% of SHR161 lies within the 30 year surface flood risk zone.
  - b. Around 2% of SHR060, 5% of SHR158 and 8% of SHR161 lies within the 100 year surface flood risk zone;
  - c. Around 4% of SHR060, 10% of SHR158 and 13% of SHR161 lies within the 1000 year surface flood risk zone which would limit development on the site.

- 7.5. This requires a site specific investigation of the surface water flood risk across the entire which should seek to protect development from surface water flow paths.
- 7.6. The proposed site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 address site specific flood risk issues, 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."*
- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation SHR060, SHR158 & SHR161 passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 address this issue further, 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."*

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

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of SHR060, SHR158 & SHR161 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 SHR060, SHR158 & SHR161.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR060, SHR158 & SHR161 constituted an appropriate proposed Sustainable Urban Extension (SUE) 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 SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring the comprehensive development of the site, including housing; high quality and flexible employment in an accessible location; a new local centre comprising an appropriate range of neighbourhood shopping facilities; other services and facilities – including education and medical; and extensive areas of green infrastructure and open space. Non-residential development will form an intrinsic component of the development, occurring alongside and cross-subsidised by housing.
  - b. Enhancing existing and providing new green infrastructure corridors through the site, thereby retaining mature trees, hedgerows, priority habitats and public rights of way and contributing to the Shrewsbury Big Town Plan strategy.
  - c. Providing appropriate green infrastructure buffers of environmental networks on the east of the site, thereby contributing to the Shrewsbury Big Town Plan strategy.
  - d. Creation of appropriate accesses to both Hanwood Road and Mytton Oak Road and an associated circular link road sufficient to sustain a bus route, potentially linked to the creation of a new 'Park and Ride' facility to the north of the site.
  - e. Providing necessary improvements to the local and strategic highway network.
  - f. Creating and enhancing pedestrian, cycle and vehicular links to and through the site; and within this area of the town to the town centre.
  - g. Appropriately buffering noise, including from roads on and near site boundaries.
  - h. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.

- 8.6. Shropshire Council expects 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. A Statement of Common Ground (SoCG03) has been completed between Shropshire Council and the site promoter. It addresses key infrastructure requirements and demonstrate the site is viable and deliverable.
- 8.8. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHR060, SHR158 & SHR161. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.9. 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.
- 8.10. 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 SHR060, SHR158 & SHR161 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 A0356), the promoter of SHR060, SHR158 & SHR161 state *"CEG is an experienced national strategic land promoter with a proven track record of delivering major sustainable urban extensions. There are no abnormal costs or technical constraints that would render the development of the site unviable or undeliverable..."*
- 9.4. They also state *"In respect of deliverability, CEG is fully committed to preparing a masterplan, submitting a planning application and bringing forward the site for development as soon as possible. Some early discussions with housebuilders have taken place to date, and it is expected that a significant proportion of the site will be brought forward early in the plan period."*
- 9.5. A Statement of Common Ground (SoCG03) has been completed between Shropshire Council and the site promoter, which provide further confidence on the viability and deliverability of the site.
- 9.6. In particular, paragraphs 6.1-6.3 of SoCG03 include:  
*"The Parties confirm that the proposed site allocation is both viable and deliverable. The Parties have extensively reviewed the policy requirements and 'Development Guidelines' provided in respect of the Site's allocation in the Regulation 18 Pre-Submission Draft Shropshire Local Plan and do not anticipate any issues in the Site's deliverability or viability in this respect.*  
*The site is capable of supporting policy compliant affordable housing provision (20%), together with the anticipated infrastructure improvements, s106 contributions and CIL payments.*  
*Shropshire Council and the parties have continued to liaise proactively regarding the viability and deliverability of this site during the Local Plan Review process and as a result it is agreed that at this stage of the process this site is viable and deliverable, having given due regard to the proposed site guidelines and policy requirements within the draft Shropshire Local Plan."*

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation SHR060, SHR158 & SHR161 are summarised within Appendix 7 of the draft Shropshire Local Plan.

- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue beyond the proposed plan period.
- 10.3. Paragraphs 6.4 and 6.6 of the SoCG03 address this matter, including: *"It is proposed that delivery of the residential element of the site is likely to be provided by a number of housebuilders, together with specialist provision of local centre uses and employment uses by commercial developers."* And *"Build out rates are expected to peak at a combined figure of 125 dwellings p.a. throughout years 2025/6 through 2034/35 with completion of the residential elements by 2036/2037."*
- 10.4. Shropshire Council considers that the timescales and rates of delivery for housing are indicative of an earlier release of the commercial development. The growth in housing numbers delivered on the site brings forward the capital to cross-subsidise the employment development. The growing numbers of people resident on the site provides some demand for the provision of services and draws demand from businesses wishing to access available labour.

**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 SHR060, SHR158 & SHR161 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 SHR060, SHR158 & SHR161.
- 11.3. The boundary for SHR060, SHR158 & SHR161 is defined by agricultural field boundaries and Mytton Oak Road to the north; property curtilages, including the curtilage of a primary school, and agricultural field boundaries to the east; Hanwood Road to the south; and the A5 and agricultural field boundaries to the west.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SHR060, SHR158 & SHR161; 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 SHR060, SHR158 & SHR161.
- 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 SHR060, SHR158 & SHR161 – 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 SHR060, SHR158 & SHR161.
- 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 SHR060, SHR158 & SHR161, 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 local employment, the modernisation of the commercial building stock, the more efficient use of



employment land, and the achievement of the proposed employment land requirement for Shropshire - consistent with the aspirations of paragraphs 8, 81, 82 and 84 of the NPPF.

- b. Promote access to services, facilities and infrastructure - consistent with paragraphs 100, 104-106, 110-113; and 114 of the NPPF.
- c. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
- d. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- e. Achieve well designed places – consistent with paragraphs 126, 127, 130 and 131 of the NPPF.

12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included comments (both in support and objection) to specific site guidelines proposed for SHR060, SHR158 & SHR161. These are summarised in SD014.01 and GC4o. Dealing with the main objections in turn:

- a. The large pool and other natural habitats on the site should be protected through creation of a Green Infrastructure corridor. Shropshire Council considers the proposed site guidelines appropriately address this matter, requiring appropriate green infrastructure buffers of environmental networks on the east of the site and enhancement of existing and provision of new green infrastructure corridors through the site - thereby retaining mature trees, hedgerows, priority habitats and public rights of way.
- b. Essential that appropriate flexibility is provided on the mix of uses proposed on the site. Shropshire Council considers proposed site guidelines strike an appropriate balance between providing flexibility and certainty on the proposed mix of uses expected on the site.
- c. Consider the amount of employment on the site should be expressed as 5ha rather than a minimum of 5ha. Shropshire Council considers that to achieve an appropriate mixed-use development and recognising opportunities on the site, it is appropriate to express the employment land guideline as a minimum. This will ensure the greatest opportunity to deliver an appropriate range of high quality and flexible employment uses, potentially as part of an enhancement to the town's 'Park and Ride' offer to the north of the site.
- d. Recognise need for a masterplan, but greater clarity required regarding approval process. Shropshire Council considers that the proposed site guideline is clear on requirements for masterplanning and subsequent Council agreement of this work.

- e. Consider the local centre should be called a neighbourhood centre (due to size) and the precise size, composition and location determined through masterplanning/planning application processes. Shropshire Council considers the term local centre is entirely appropriate and that proposed site guidelines provide an appropriate balance between providing flexibility and certainty on size, composition and location.
- f. Services and facilities required need to be guaranteed to be delivered as part of the development. Shropshire Council agrees with this principle and considers site guidelines (particularly expectations for masterplanning and specific requirements for services, facilities and infrastructure) and the wider policy framework in the draft Shropshire Local Plan provide necessary certainty on this matter.
- g. Support provision of land for education facilities, but further evidence required regarding the quantum of land needed. Shropshire Council considers the infrastructure requirements expressed within site guidelines, including for education facilities, have been appropriately informed by the site assessment process and continued proactive engagement with infrastructure providers.
- h. Support provision of land for medical facilities, but quantum of land needed should be established through masterplanning processes. Shropshire Council considers the infrastructure requirements expressed within site guidelines, including for medical facilities, have been appropriately informed by the site assessment process and continued proactive engagement with infrastructure providers.
- i. Acknowledge the need for highway improvements, but concerned about the imprecise wording of requirements to improve local and strategic road networks. Shropshire Council considers it is essential that necessary improvements to the local and strategic road network to support this development are delivered. However, to provide greater certainty, a main modification is proposed within GC4m.
- j. Opportunity for traffic signals where the A5 joins Hanwood Road. Shropshire Council considers site guidelines provide certainty that necessary improvements to the local and strategic road network to support this development are delivered.
- k. Support provision of a 'Park and Ride' but concerned about requirements to access Hanwood Road. Shropshire Council considers the infrastructure requirements expressed within site guidelines, including for highway matters, have been appropriately informed by the site assessment process and continued proactive engagement with infrastructure providers.

- l. Separate cycle and pedestrian routes should be created to and through the site, particularly linking to the new schools. Shropshire Council supports this principle and considers existing proposed site guidelines provide appropriate certainty on this matter. They include an expectation that development will create and enhance pedestrian and cycle links within and through the site, in this area of town and from the site into the town centre.
- m. Site guidelines should include a requirement for appropriate playing pitch, ancillary car parking/changing room provision, and the future management of these facilities. Shropshire Council supports this principle, which is consistent with expectations in draft Policy DP15. However, to provide greater certainty, the Council has proposed a main modification within GC4m. This states *"Either on or off site contributions are made towards the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. These playing fields are managed and maintained in perpetuity by way of legal agreement."*
- n. Concern about flooding at the site, considered a sustainable drainage plan is required. Shropshire Council considers existing proposed site guidelines appropriately address this matter – they include a requirement that the site incorporates appropriate sustainable drainage, informed by a sustainable drainage strategy.

**Questions: Site Allocation SHR166 – Land to the west of the A49, Shrewsbury – see MM116**

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

**Shropshire Council Response:**

- 1.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

- 2.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

- 3.1. The Council has revisited the allocation of this site, and its continued justification, in light of the designation of a Scheduled Monument on the site in October 2022 (reported to the Examination by Historic England in OD003a). The updated site assessment is included as appendix x to this Matter Statement.
- 3.2. The assessment of this site which informed the submission plan recognised heritage issues with the site but at that stage this was in the context of 1) the site being a non-designated heritage asset and 2) the impact on the setting of Scheduled Monument. Both these issues were raised by Historic England at the Reg 18 stage, and by the Council's own Heritage assessment. Ultimately, within this context, the Council's view was there was justification for this site to be allocated.
- 3.3. Whilst the Council arrived at the conclusion to allocate this site, based upon the information from the site assessment process, the re-assessment of this site in light of the Scheduled status has changed the balance of considerations.
- 3.4. Having undertaken this assessment, the Council now considered there is no longer a justification for the allocation of this site for the purposes of employment land due to significant constraints placed upon the site by the Scheduled monument.
- 3.5. Specifically, with reference to NPPF (2021) Para 201, the Council considers there would likely be substantial harm to this designated asset. It is considered there is no substantial public benefit which would outweigh the harm to this asset, and the proposed allocation does not meet the requirements contained in Para 201 a) – d).
- 3.6. As such it is now considered the SHR166 should be removed from the Local Plan. As such the Council have not responded to the other questions in this section.
- 3.7. The Council consider the implications of the proposed removal of the SHR166 within its response to Matter 4, question 1.

**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. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

5.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

6.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

**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. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

**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. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

9.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

10.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

11.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.

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

**Shropshire Council Response:**

12.1. SHR166 is proposed to be removed from the Local Plan and the employment land supply for Shrewsbury and Shropshire for the reasons provided in response to Question 3.