

Shropshire Local Plan Examination

Shropshire Council Response to:

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

Matter 24



Matter 24 - Whitchurch Place Plan Area (policy S18) – see MM123

Issue: Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Questions: Place Plan Area

Question 1. *Is the approach taken to development in the Place Plan Area, justified, effective and consistent with national policy?*

Shropshire Council Response:

- 1.1. Shropshire Council considers the proposed approach to development in the Whitchurch Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Whitchurch Place Plan area is established within draft settlement policies S18.1-S18.4, and then appropriately expanded upon through the other policies of the draft Shropshire Local Plan.
- 1.3. These draft settlement policies align with and implement the proposed strategic approach to the level and distribution of development across Shropshire – particularly the principle of urban focus; but crucially are also responsive to the characteristics, constraints, and opportunities of the various settlements in the Place Plan area.
- 1.4. In positively responding to the characteristics, constraints and opportunities of the settlements in the Whitchurch Place Plan area, the draft Shropshire Local Plan identifies Whitchurch, Prees, Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall as specific locations to accommodate development. Specifically:
 - a. Whitchurch is proposed to be identified as a Principal Centre where growth will respond to need in the town, its surrounding hinterland and contribute towards achieving strategic growth objectives in the east of the County, consistent with the requirements of Policy S18.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Bridgnorth envisage the delivery of around 1,675 dwellings between 2016 and 2038 and that around 20ha of employment land will be made available for employment development in order to create choice and competition in the market between 2016 and 2038 (subject to proposed main modifications within Schedule GC4m).

- b. Prees is a significant rural service centre, as such it is proposed to be identified as a Community Hub where new development will respond to local needs consistent with Policy S18.2, Policy SP8, and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Dudleston Heath envisage the delivery of around 170 dwellings between 2016 and 2038.
 - c. Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall are a proposed Community Cluster where new development will respond to local needs, consistent with the requirements of Policy S18.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of these settlements, no specific development guidelines or allocations are proposed.
- 1.5. In identifying site allocations to contribute to the achievement of the strategies proposed for Whitchurch and Prees, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
 - 1.6. Through this process three proposed residential allocations were identified at Whitchurch (WHT014, WHT037 & WHT044, and WHT042) and one proposed residential allocation was identified at Prees (PW025). This assessment work is summarised within Appendix S (SD006.20) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
 - 1.7. The Whitchurch Place Plan area does not have any realistic functional relationship to the Black Country, due to its geographic location within Shropshire. As a result, no settlement in the Ellesmere Place Plan area was identified as a potential location to accommodate proposed contributions to the Black Country.
 - 1.8. Shropshire Council considers that development proposals in the Place Plan area will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire; contribute to the achievement of sustainable development that meets the needs of all groups within the communities of the Place Plan area; and support the long-term sustainability of Shropshire.
 - 1.9. The Council considers the proposed approach to development in the Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan. In particular, it is responsive to the conclusions of:
 - a. Sustainability Appraisal and Site Assessment processes (SD006.01-SD006.22 and GC44).
 - b. The Hierarchy of Settlements (EV060).

- c. Assessments of the characteristics of settlements, including the Market Town Profiles (most recent publications EV073.01- EV073.17).
 - d. Conclusions of infrastructure planning processes (most recent publication is GC54).
- 1.10. The Council considers the proposed approach to development in the Place Plan area is effective as it includes a clear strategy and detailed criteria to manage development over the entire geography. This ensures a shared understanding amongst communities, developers and decision makers. As such, it is considered implementable and deliverable over the proposed plan period.
- 1.11. The Council considers the proposed approach to development in the Place Plan area is consistent with national policy. In particular it:
- a. Conforms with the principles of plan making in Chapter 3 of the 2021 National Planning Policy Framework (NPPF).
 - b. Supports delivery of sufficient and appropriate forms of housing, contributing to achievement of the housing needs of all groups within the communities of the Place Plan area, consistent with Chapter 5 of the NPPF.
 - c. Supports the delivery of sufficient and appropriate forms of employment within the Place Plan area, consistent with Chapter 6 of the NPPF.
 - d. Promotes the health and wellbeing of communities within the Place Plan area, consistent with Chapter 8 of the NPPF.
 - e. Ensures the vitality of local centres and supports access to and use of sustainable transport, services and facilities, consistent with Chapter's 7, 9 and 10 of the NPPF.
 - f. Positively responds to the built and natural environment, and the challenge of climate change, consistent with Chapter's 14-16 of the NPPF.

Questions: Site Allocation WHT014 – Land at Liverpool Road, Whitchurch

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the south-west of Whitchurch. It consists of part of a large agricultural field. It is bounded by residential property curtilages to the north and east, residential property curtilages and agricultural field boundaries to the south; and agricultural field boundaries and the extent of the proposed allocation to the west.

- 1.2. To inform the identification of proposed site allocations, including WHT014, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix S (SD006.20) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.

- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Whitchurch Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 52 sites were considered at Whitchurch. Within Stage 3 of the site assessment process, around 38 sites were considered at Whitchurch.
- 1.11. WHT014 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WHT014 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of WHT014 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
 - a. There is insufficient justification of why WHT014 was proposed for allocation over other sites. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions

reached. This site assessment process fully justifies the identification of WHT014 as a proposed allocation.

- b. Site assessment has been inconsistent and conclusions reached are unclear. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of WHT014 as a proposed allocation.
- c. The highway network cannot support this allocation. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Highway Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT014 as a proposed allocation.

There has been over-development in the town, the area is already densely populated and the site should be retained as countryside. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT014 as a proposed allocation.

- 1.14. In conclusion, Shropshire Council considers that WHT014 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. WHT014 is proposed to be allocated for residential development. This site is some 2.18ha in size and the approximate site provision figure is some 70 dwellings.
- 2.2. Detailed development guidelines within Schedule S18.1(i) of draft Policy S18.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S18.1(i) of draft Policy S18.1 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 WHT014.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

Question 4. *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

Shropshire Council Response:

- 4.1. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. No planning application has been submitted on the site to date.

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

Shropshire Council Response:

- 5.1. WHT014 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WHT014 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 Whitchurch and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.

- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
 - a. Improvement of the Liverpool Road/Wrexham Road junction.
 - b. Ability to provide green infrastructure and open space – including a landscape buffer to the south and east of the site and to ensure the amenity of existing housing at Alkington Road.
- 5.5. More generally, it is also considered that development of WHT014 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 WHT014 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 WHT014.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHT014 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WHT014 within Schedule S18.1(i) of draft Policy S18.1 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. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
 - b. Applying the precautionary principle, a small part of the site consists of best and most versatile agricultural land (the rest is classified as urban). However, applying the precautionary principle the majority of the land around Whitchurch similarly constitutes best and most versatile agricultural land. This has been appropriately considered within the site assessment.

- c. A small component of the site is located within the surface water flood risk zone and within 20m of an historic flood even and detailed river network. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- d. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on Brown Moss and Fenns etc. Habitats Regulations Assessment (HRA) was also required to assess nitrogen oxide pollution from increased road traffic (in combination) on Clarepool Moss and Hanmere Mere (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S18.1. This policy includes a requirement for mitigation measures will be to remove any adverse effect from increased recreational pressure arising from development in Whitchurch on the integrity of the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site and Brown Moss SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents.
- e. The site contains field trees and hedgerows. As such, site guidelines require mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network. Furthermore, 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 WHT014.

- 7.4. With specific regard to flood risk at WHT014, in summary:
 - a. With regard to fluvial flood risk, the proposed allocation is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 1% of the proposed allocation is located within the 100 year surface flood risk zone and around 2% in the 1,000 year surface flood risk zone. Furthermore 8% of the site is located within 20m of a historic flood event and a detailed river network.
- 7.5. The proposed site guidelines for WHT014 within Schedule S18.1(i) of draft Policy S18.1 address this issue, stating "*The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.*"
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WHT014. It concluded that the site WHT014 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 WHT014 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 WHT014.

- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHT014 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WHT014 within Schedule S18.1(i) of draft Policy S18.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Providing an appropriate access to the site.
 - b. Providing necessary improvements to the local and strategic road network – including the Liverpool Road/Wrexham Road junction.
 - c. Green infrastructure and open space – including a landscape buffer to the south and east of the site and to ensure the amenity of existing housing at Alkington Road.
 - d. Retention and enhancement of the trees and hedgerows on the site.
- 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 WHT014. 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 WHT014 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 their Regulation 19 consultation response (reference A0201), the promoter of WHT014 stated *"In light of PH's land interests we support the allocation of Land at Liverpool Road, Whitchurch (WHT014) for 70 new homes. The site is deliverable, sustainable and would complement the draft Plan's spatial strategy and can be brought forward in a manner that delivers the aspirations contained in the draft policy."*
- 9.4. It also states *"In terms of deliverability, the site is in the sole control of PH who are committed to bringing it forward for development and intend to submit a planning application upon adoption of the Local Plan. Following approval of the planning application, we expect the site to yield approximately 50 dwellings per annum within the early part of the Plan Period. The site is suitable, available and achievable and, therefore, deliverable."*

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 WHT014 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-

to-date assessment of the housing land supply in Shropshire (GC47).

- 10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2028/29. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. The Council would note that the promoter of the WHT014 specified within their Regulation 19 Representation (A0201) that "*In terms of deliverability, the site is in the sole control of PH who are committed to bringing it forward for development and intend to submit a planning application upon adoption of the Local Plan. Following approval of the planning application, we expect the site to yield approximately 50 dwellings per annum within the early part of the Plan Period. The site is suitable, available and achievable and, therefore, 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 WHT014 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 WHT014.
- 11.3. The boundary for WHT014 is defined by residential property curtilages to the north and east, residential property curtilages and agricultural field boundaries to the south; and agricultural field boundaries and the extent of the proposed allocation 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 WHT014 within Schedule S18.1(i) of draft Policy S18.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WHT014; 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 WHT014.
- 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 WHT014 – 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 WHT014.
- 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 WHT014, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
- c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
- d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
- e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

12.8. Shropshire Council is not aware of any significant objections raised to the proposed site guidelines proposed for WHT014 during the Regulation 19 Pre-Submission Consultation summarised in SD014.01 and GC4o.

Questions: Site Allocation WHT037 & WHT044 – Land north of Chester Road, Whitchurch

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north-west of Whitchurch. It consists of four agricultural fields and components of three further agricultural fields. It is bounded by residential property curtilages, a private drive and Haroldgate Road to the north; agricultural field boundaries to the east; agricultural field boundaries and Chester Road to the south; and agricultural field boundaries and the extent of the proposed allocation to the west.
- 1.2. To inform the identification of proposed site allocations, including WHT037 & WHT044, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is

summarised within Appendix S (SD006.20) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).

- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.

- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Whitchurch Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 52 sites were considered at Whitchurch. Within Stage 3 of the site assessment process, around 38 sites were considered at Whitchurch.
- 1.11. WHT037 & WHT044 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WHT037 & WHT044 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process and proposed allocation WHT037 & WHT044. These objections are summarised in SD014.01 and GC4o. They included:
 - a. That the conclusions of Stage 2a of the site assessment process do not support the identification of WHT037 & WHT044 as a proposed allocation. Shropshire Council considers the conclusions of Stage 2a of the site assessment process were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.
 - b. There is insufficient justification of why WHT037 & WHT044 was proposed for allocation over other sites. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of WHT037 & WHT044 as a proposed allocation.
 - c. The site is unsustainable and/or undeliverable. Shropshire Council considers the proposed allocation is informed by a proportionate and robust site assessment which included consideration of sustainability (informed by a range of factors) and deliverability. The assessment process and conclusions

reached are unambiguously summarised and fully justify the identification of WHT037 & WHT044 as a proposed allocation.

- d. The site is subject to flood risk - surface & groundwater issues, which means it is unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of flood risk informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39). The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT037 & WHT044 as a proposed allocation.
- e. The site has a poor relationship to the existing built form / partly landlocked, as such the site is unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of the sites relationship to the existing built form of the settlement and analysis undertaken by Highways Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT037 & WHT044 as a proposed allocation.
- f. The highway network cannot support this allocation. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Highway Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT037 & WHT044 as a proposed allocation.
- g. Significant development has already been concentrated in this part of the town / overdevelopment has occurred, so this site is unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT037 & WHT044 as a proposed allocation.
- h. Site assessment has been inconsistent and conclusions reached are unclear. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of WHT037 & WHT044 as a proposed allocation.

1.14. In conclusion, Shropshire Council considers that WHT037 & WHT044 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. WHT037 & WHT044 is proposed to be allocated for residential development. This site is some 8.58ha in size and the approximate site provision figure is some 200 dwellings.
- 2.2. Detailed development guidelines within Schedule S18.1(i) of draft Policy S18.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S18.1(i) of draft Policy S18.1 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 WHT037 & WHT044.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

Question 4. *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

Shropshire Council Response:

- 4.1. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. No planning application has been submitted on the site to date.

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

Shropshire Council Response:

- 5.1. WHT037 & WHT044 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WHT037 & WHT044 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 Whitchurch and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
 - a. Ensuring the comprehensive development of the site – including provision of pedestrian and cycle (but not vehicular) links between Chester Road and Tarporley Road.
 - b. Ability to enhance pedestrian and cycle links to and through the site into the town centre.
 - c. Ability to provide green infrastructure and open space – including mature trees, hedgerows and priority habitats on the site.
- 5.5. More generally, it is also considered that development of WHT037 & WHT044 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 WHT037 & WHT044 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 WHT037 & WHT044.

- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHT037 & WHT044 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WHT037 & WHT044 within Schedule S18.1(i) of draft Policy S18.1 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. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
 - b. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, applying the precautionary principle the majority of the land around Whitchurch similarly constitutes best and most versatile agricultural land. This has been appropriately considered within the site assessment.
 - c. A component of the site is located within the surface water flood risk zone and within 20m of an historic flood even and detailed river network. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
 - d. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on Brown Moss and Fenns etc. Habitats Regulations Assessment (HRA) was also required to assess nitrogen oxide pollution from increased road traffic (in combination) on Clarepool Moss and Hanmere Mere (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S18.1. This policy includes a requirement for mitigation measures will be to remove any adverse effect from increased recreational pressure arising from development in Whitchurch on the integrity of the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site and Brown Moss SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents.

- e. The site contains field trees and hedgerows. As such, site guidelines require mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- f. Noise associated with the adjoining road. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to manage this noise. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.

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 WHT037 & WHT044.
- 7.4. With specific regard to flood risk at WHT037 & WHT044, in summary:
 - a. With regard to fluvial flood risk, the proposed allocation is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 3% of the proposed allocation is located within the 30 and 100 year surface flood risk zones; around 6% of the proposed allocation is located within the 1,000 year surface flood risk zone. A small part of the site is also located within proximity of an historic flood event and detailed river network.

- 7.5. The proposed site guidelines for WHT037 & WHT044 within Schedule S18.1(i) of draft Policy S18.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a Sustainable Drainage Strategy in line with policy DP22. All surface water from the site will be managed effectively, with run-off restricted to greenfield rates. Any areas of flood risk will be excluded from development and 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 WHT037 & WHT044. It concluded that the site WHT037 & WHT044 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 WHT037 & WHT044 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 WHT037 & WHT044.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHT037 & WHT044 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WHT037 & WHT044 within Schedule S18.1(i) of draft Policy S18.1 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 provision of pedestrian and cycle (but not vehicular) links between Chester Road and Tarporley Road.
 - b. Providing necessary improvements to the local and strategic road network.
 - c. Enhancing pedestrian and cycle links to and through the site into the town centre.
 - d. Providing green infrastructure and open space – including mature trees, hedgerows and priority habitats on the site.
 - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WHT037 & WHT044. 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 WHT037 & WHT044 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 their Regulation 19 consultation response (reference A0515), the promoter of WHT037 & WHT044 stated *"All three owners are working in collaboration and partnership with David Wilson Homes (DWH) to ensure the site is available, deliverable and comes forward for development, at the first opportunity. "*

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 WHT037 & WHT044 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2033/34. 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.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that within their Regulation 19 consultation response (reference A0515), the promoter of WHT037 & WHT044 stated *"All three owners are working in collaboration and partnership with David Wilson Homes (DWH) to ensure the site is available, deliverable and comes forward for development, at the first opportunity. "*

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 WHT037 & WHT044 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 WHT037 & WHT044.
- 11.3. The boundary for WHT037 & WHT044 is defined by residential property curtilages, a private drive and Haroldgate road to the north; agricultural field boundaries to the east; agricultural field boundaries and Chester Road to the south; and agricultural field boundaries and the extent of the proposed allocation 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 WHT037 & WHT044 within Schedule S18.1(i) of draft Policy S18.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WHT037 & WHT044; 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 WHT037 & WHT044.
- 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 WHT037 & WHT044 – 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 WHT037 & WHT044.
- 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 WHT037 & WHT044, 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 objections to specific site guidelines proposed for WHT037 & WHT044. These are summarised in SD014.01 and GC4o. This included:
 - a. Detailed requirements should be informed by additional site specific evidence as part of the Planning Application process. Shropshire Council considers the proposed site guidelines strike an appropriate balance between providing certainty to all parties that key opportunities and constraints identified through the site

assessment process will be addressed, whilst maintaining flexibility to respond to evidence prepared in support of any future Planning Application on the site.

- b. The proposed approximate site provision figure is too low. Shropshire Council considers the proposed capacity is appropriate and suitable flexibility is provided within draft Policy S16.1 which recognises site provision figures are 'approximate'. Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.
- c. Query guideline related to quality, design, mix and layout as there is no assessment of impact of different housing mix provisions on viability, a consistent theme in Planning Appeal Decisions regarding Planning Authority attempts to impose a housing mix on market dwellings. There is also no reference to demand, a key component of housing provision. Shropshire Council considers that it is entirely appropriate for the draft guidelines to require an appropriate dwelling mix that responds to local needs – this is consistent with the expectations of draft Policy DP1. Draft Policy DP1 includes detailed information on dwelling mix, the proposals for which were informed by viability assessment within EV115.01.

Questions: Site Allocation WHT042 – Land north of Waymills, Whitchurch

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 east of Whitchurch. It consists of part of one agricultural field and the entirety of another agricultural field (alongside associated land). It is bounded by agricultural field boundaries to the north, the extent of an existing employment allocation to the east, residential curtilages and an existing residential allocation currently the subject of development to the south, and the railway line and associated corridor to the west.
- 1.2. To inform the identification of proposed site allocations, including WHT042, the Council undertook a proportionate and robust three-stage site assessment process.

- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix S (SD006.20) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study

- (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Whitchurch Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 52 sites were considered at Whitchurch. Within Stage 3 of the site assessment process, around 38 sites were considered at Whitchurch.
- 1.11. WHT042 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WHT042 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process and proposed allocation WHT042. These objections are summarised in SD014.01 and GC4o. They included:
- a. The site is landlocked and requires development of the adjoining existing allocation first, as such the site is unsuitable and undeliverable. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of the sites relationship to the existing built form of the settlement and analysis undertaken by Highways Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT042 as a proposed allocation. The Council would also note that the adjoining

allocation is currently the subject of development (22/03708/FUL).

- b. The site is in close proximity of Staggs Brock Wildlife Site and so unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Ecology Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT042 as a proposed allocation.
 - c. The site is in flood zones 2/3 and so unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of flood risk informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39). The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of WHT042 as a proposed allocation.
- 1.14. In conclusion, Shropshire Council considers that WHT042 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. WHT042 is proposed to be allocated for residential development. This site is some 8.15ha in size and the approximate site provision figure is some 180 dwellings.
- 2.2. Detailed development guidelines within Schedule S18.1(i) of draft Policy S18.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S18.1(i) of draft

Policy S18.1 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 WHT042.

- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

Question 4. *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

Shropshire Council Response:

- 4.1. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. No planning application has been submitted on the site to date.

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

Shropshire Council Response:

- 5.1. WHT042 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WHT042 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 Whitchurch and Shropshire.
- 5.3. The site location, extent, proposed boundaries and relationship to existing allocations, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft

Shropshire Local Plan have been reflected within the proposed site guidelines.

- 5.5. These include:
- a. Ensuring the comprehensive development of the site – integrating into development on existing allocations WHIT051 and ELR033.
 - b. Providing any further necessary cross-subsidy to support delivery of employment on existing allocation ELR033.
 - c. Provision of a pedestrian crossing at Waymills.
 - d. Provision of a pedestrian link to the public right of way to the north of the site.
 - e. Subject to ecological surveys, facilitation of opportunities to improve pedestrian and wheelchair access to the eastern railway platform.
 - f. Ability to provide green infrastructure and open space – including a buffer of the river (which runs through part of the site) and associated environmental network and existing employment allocation and will include mature trees, hedgerows and priority habitats on the site.
- 5.6. More generally, it is also considered that development of WHT042 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 WHT042 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 WHT042.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHT042 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WHT042 within Schedule S18.1(i) of draft Policy S18.1 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. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
 - b. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, applying the precautionary principle the majority of the land around Whitchurch similarly constitutes best and most versatile agricultural land. This has been appropriately considered within the site assessment.
 - c. A component of the site is located within the fluvial flood risk zone and 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. They also require development to be excluded from the component of the site located in flood zones 2 and/or 3.
 - d. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on Brown Moss and Fenns etc. Habitats Regulations Assessment (HRA) was also required to assess nitrogen oxide pollution from increased road traffic (in combination) on Clarepool Moss and Hanmere Mere (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S18.1. This policy includes a requirement for mitigation measures will be to remove any adverse effect from increased recreational pressure arising from development in Whitchurch on the integrity of the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site and Brown Moss SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents.
 - e. The site contains part of an environmental network. As such, site guidelines require green infrastructure to buffer the river and associated environmental network, mature trees, hedgerows, and priority habitats. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - f. There is a Grade II listed railway footbridge (NHLE ref. 1376790) on the north-west boundary of site. The site also contains the former engine house (HER PRN 29080) for the London & North Western Railway, and a former field barn (HER 29081), and has some archaeological potential. As such site guidelines require the site design and layout to reflect and respect heritage assets on site and in the wider area, particularly the nearby Grade II listed railway footbridge. Furthermore, draft Policy DP23 ensures the

conservation, enhancement and restoration of historic environment assets in Shropshire.

- g. The site contains field trees and hedgerows. As such, site guidelines require mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- h. Noise associated with the adjoining railway line, roads and future employment site. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to manage these sources of noise. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.

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 WHT042.
- 7.4. With specific regard to flood risk at WHT042, in summary:
 - a. With regard to fluvial flood risk, around 6% of the proposed allocation is located within Flood Zones 2 and 3, areas with higher risk of flooding; the remainder is located within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 4% of the proposed allocation is located within the 1,000 year surface flood risk zone.

- 7.5. The proposed site guidelines for WHT042 within Schedule S18.1(i) of draft Policy S18.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy in line with Policy DP22 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 WHT042. It concluded that the site WHT042 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 WHT042 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 WHT042.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHT042 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WHT042 within Schedule S18.1(i) of draft Policy S18.1 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 – integrating into development on existing allocations WHIT051 and ELR033.
 - b. Providing necessary improvements to the road network.
 - c. Provision of a pedestrian crossing at Waymills.
 - d. Provision of a pedestrian link to the public right of way to the north of the site.
 - e. Subject to ecological surveys, facilitation of opportunities to improve pedestrian and wheelchair access to the eastern railway platform.
 - f. Ability to provide green infrastructure and open space – including a buffer of the river (which runs through part of the site) and associated environmental network and existing employment allocation and will include mature trees, hedgerows and priority habitats on the site.
 - g. 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. This scheme will also provide any further necessary cross-subsidy to support delivery of employment on existing allocation ELR033.
- 8.8. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WHT042. 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 WHT042 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 from the site promoter appended to EV113 they stated, *“We can confirm that development of WHT042 is viable and deliverable, having regard to the policy requirements identified within the Pre-Submission Draft of the 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 WHT042 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2035/36. 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.

10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation WHT042 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 WHT042.
- 11.3. The boundary for WHT042 is defined by agricultural field boundaries to the north, the extent of an existing employment allocation to the east, residential curtilages and an existing residential allocation currently the subject of development to the south, and the railway line and associated corridor 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 WHT042 within Schedule S18.1(i) of draft Policy S18.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WHT042; 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 WHT042.
- 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 WHT042 – 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 WHT042.
- 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 WHT042, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is not aware that representations during the Regulation 19 Pre-Submission Consultation included any significant objections to the specific site guidelines proposed for WHT042. These are summarised in SD014.01 and GC4o.

Questions: Site Allocation PPW025 – Land north of Tudor House, Prees

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north of the village of Prees. It consists of the majority of an agricultural field. It is bounded an access road and associated residential development to the north, Whitchurch Road to the east, residential property curtilages to the south, and the extent of the proposed allocation to the west.
- 1.2. To inform the identification of proposed site allocations, including PPW025, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix S (SD006.20) of the of Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability:* Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.

- c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Whitchurch Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 26 sites were considered at Prees. Within Stage 3 of the site assessment process, around 12 sites were considered at Prees.
- 1.11. PPW025 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and PPW025 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken to identify proposed allocation PPW025. These objections are summarised in SD014.01 and GC4o. They included:
- a. There is insufficient justification of why PPW025 was proposed for allocation over other sites. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of PPW025 as a proposed allocation.
 - b. The site is not justified and is unsound. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of PPW025 as a proposed allocation.
 - d. The site is undeliverable and unsustainable. Shropshire Council considers the proposed allocation is informed by a proportionate and robust site assessment which included consideration of deliverability. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of PPW025 as a proposed allocation.
 - c. The site is subject to flood risk (and will cause increased flooding elsewhere) that mean it is unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of flood risk informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39). The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of PPW025 as a proposed allocation.
 - d. The site is subject to noise constraints that mean it is unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Public Protection Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of PPW025 as a proposed allocation.
 - e. The site is in proximity of heritage assets (Conservation Area and several listed buildings) and will cause unacceptable harm. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Heritage Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of PPW025 as a proposed allocation.

- 1.14. In conclusion, Shropshire Council considers that PPW025 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. PPW025 is proposed to be allocated for residential development. This site is some 1.76ha in size and the approximate site provision figure is some 35 dwellings.
- 2.2. Detailed development guidelines within Schedule S18.2(i) of draft Policy S18.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S18.2(i) of draft Policy S18.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PPW025.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

Question 4. *What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?*

Shropshire Council Response:

- 4.1. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. No planning application has been submitted on the site to date.

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

Shropshire Council Response:

- 5.1. PPW025 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of PPW025 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 Prees and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
 - a. Ability to provide green infrastructure and open space – including mature trees, hedgerows and priority habitats on the site.
 - b. A review of speed limits and provision of traffic calming measures on Whitchurch Road.
- 5.5. More generally, it is also considered that development of PPW025 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 PPW025 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 PPW025.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PPW025 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for PPW025 within Schedule S18.2(i) of draft Policy S18.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified – main modifications are proposed to these site guidelines in GC4m. 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. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
 - b. Part of the site consists of best and most versatile agricultural land. However, applying the precautionary principle the majority of the land around Prees similarly constitutes best and most versatile agricultural land. This has been appropriately considered within the site assessment.
 - c. A component of the site is located within the fluvial flood risk zone and 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. They also require development to be excluded from the component of the site located in flood zones 2 and/or 3.
 - d. Habitats Regulations Assessment (HRA) was required to assess recreational impact (in combination) on n Fenns, Whixall, Bettisfield, Cadney and Wem Mosses. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S18.2. This policy includes a requirement for mitigation measures to remove any adverse effect from increased recreational pressure arising from development in Prees on the integrity of the Cole Mere Ramsar site and the

Fenns, Whixall, Bettisfield, Wem and Cadney Mosses
SAC/Ramsar site in accordance with policies DP12, DP14 and DP15.

- e. The site contains field trees and hedgerows. As such, site guidelines require mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- f. Potential impact on settings of Grade II listed 14-16 Whitchurch Road (NHLE ref. 1236426), Tudor House (NHLE ref. 1236340), Barn c. 20m N of Tudor House (NHLE ref. 1264627), and 9 Whitchurch Road (NHLE ref. 1222022). Site also immediately adjacent to boundary of, and within setting, of Prees Conservation Area. As such site guidelines require a proportionate Heritage Impact Assessment to inform the development. They also require the design of any development to be comparable in scale and form to adjacent buildings within the Conservation Area, particularly with respect to layout, scale, form and materials and should include a landscape buffer to the heritage assets to the south of the site.
- g. Noise associated with the roads to the east. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to manage these sources of noise. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.

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 PPW025.

- 7.4. With specific regard to flood risk at PPW025, in summary:
 - a. With regard to fluvial flood risk, 3% of the proposed allocation is located within Flood Zone 2; 7% of the proposed allocation is located within Flood Zone 3 (Flood Zones 2 and 3 are areas with higher flood risk and overlap); and 93% of the proposed allocation is located within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 1% of the proposed allocation is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for PPW025 within Schedule S18.2(i) of draft Policy S18.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, 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 PPW025. It concluded that the site PPW025 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 PPW025 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 PPW025.

- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PPW025 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for PPW025 within Schedule S18.2(i) of draft Policy S18.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Providing an appropriate access to the site.
 - b. Providing necessary improvements to the road network - including A review of speed limits and provision of traffic calming measures on Whitchurch Road.
 - c. Providing green infrastructure and open space.
 - d. Retention and enhancement of trees, hedgerows and priority habitats on the site.
 - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of PPW025. 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 PPW025 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 their Regulation 19 consultation response (reference A0591), the site promoter stated, *"The land is available, viable and deliverable and will be brought forward at the earliest opportunity."*

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 PPW025 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2029/30. The Council also anticipates that development will progress at a rate of up to 20 dwellings per annum, consistent with standard assumptions for this size of site in this part of Shropshire.

- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that within their Regulation 19 consultation response (reference A0591), the site promoter stated, *"The land is available, viable and deliverable and will be brought forward at the earliest opportunity."*

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 PPW025 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 PPW025.
- 11.3. The boundary for PPW025 is defined by an access road and associated residential development to the north, Whitchurch Road to the east, residential property curtilages to the south, and the extent of the proposed allocation 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 PPW025 within Schedule S18.2(i) of draft Policy S18.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of PPW025; 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 PPW025.
- 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 PPW025 – 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 PPW025.
- 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 PPW025, 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 objections to specific site guidelines proposed for PPW025. These are summarised in SD014.01 and GC4o.

12.9. They include:

- a. The site guideline regarding heritage should include reference to careful consideration of scale, massing and layout of development on the part of the site fronting Whitchurch Road and provision of a suitable and well-designed landscape buffer at the southern end of the site, to provide an area of amenity space and a stand off from the Barn. Shropshire Council supports this proposal and an appropriate main modification has been proposed within GC4m.
- b. The site guideline regarding heritage should require development to be of a comparable scale to adjacent form and of good design standard, with a palate of materials that is informed by and is in keeping the local vernacular. Shropshire Council supports this proposal and an appropriate main modification has been proposed within GC4m.
- c. Site guidelines do not adequately address potential impacts on the nearby Conservation Area and several listed buildings. Shropshire Council considers that together with main modification proposed within GC4m, site guidelines appropriately address heritage matters.
- d. Site guidelines do not adequately address flood risk management. Shropshire Council considers that proposed site guidelines, alongside wider policies in the adopted Development Plan (particularly DP21), provide certainty on the expectations for any development of the site to address flood risk. Site guidelines have been informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39)
- e. Site guidelines do not adequately address acoustic mitigation. Shropshire Council considers that proposed site guidelines, alongside wider policies in the adopted Development Plan (particularly DP18), provide certainty on the expectations for any development of the site to address noise. Site guidelines have been informed by analysis by Public Protection Officers.