

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 22**



## **Matter 22 – Shrewsbury Place Plan Area (policy S16) – see MMs 110-121**

***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 Shrewsbury Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Shrewsbury Place Plan area is established within draft settlement policies S16.1- S16.4, 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 Shrewsbury Place Plan area, the draft Shropshire Local Plan identifies Shrewsbury, Baschurch, Bayston Hill, Bicton, Bomere Heath, Cross Houses, Dorrington, Ford, Hanwood, Longden, Nesscliffe, Albrighton; Grafton and Newbanks; and Montford Bridge West as locations to accommodate development. Specifically:
  - a. Shrewsbury is proposed to be identified as a Strategic Centre and primary focus for new development in the County. This development will be in accordance with the requirements of Policy S16.1 and other relevant policies of the Shropshire Local Plan. It will respond to needs in the town and its surrounding hinterland, it will also support the expansion of existing businesses and attract inward investment. Proposed development guidelines for Shrewsbury envisage the delivery of around 8,975 dwellings between 2016 and 2038 and that around 100ha of employment land will be made available for employment development in order to create choice and competition in the market between 2016 and 2038.

- b. Baschurch, Bayston Hill, Bicton, Bomere Heath, Cross Houses, Dorrington, Ford, Hanwood, Longden and Nesscliffe are significant rural service centres. As such, it is proposed they will be identified as Community Hubs where new development will respond to local needs consistent with Policy S16.2, Policy SP8, and other relevant policies of the Shropshire Local Plan.
    - i. Proposed development guidelines for Baschurch envisage the delivery of around 360 dwellings between 2016 and 2038.
    - ii. Proposed development guidelines for Bayston Hill envisage the delivery of around 200 dwellings between 2016 and 2038.
    - iii. Proposed development guidelines for Bicton envisage the delivery of around 30 dwellings between 2016 and 2038.
    - iv. Proposed development guidelines for Bomere Heath envisage the delivery of around 110 dwellings between 2016 and 2038.
    - v. Proposed development guidelines for Cross Houses envisage the delivery of around 90 dwellings between 2016 and 2038.
    - vi. Proposed development guidelines for Dorrington envisage the delivery of around 150 dwellings between 2016 and 2038.
    - vii. Proposed development guidelines for Ford envisage the delivery of around 125 dwellings between 2016 and 2038.
    - viii. Proposed development guidelines for Hanwood envisage the delivery of around 50 dwellings between 2016 and 2038.
    - ix. Proposed development guidelines for Longden envisage the delivery of around 50 dwellings between 2016 and 2038.
    - x. Proposed development guidelines for Nesscliffe envisage the delivery of around 115 dwellings between 2016 and 2038.
  - c. Albrighton, Grafton & Newbanks, and Montford Bridge West are proposed to be identified as Community Clusters where new development will respond to local needs, consistent with the requirements of Policy S16.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of these settlements, no specific development guidelines or site allocations are proposed.
- 1.5. A Neighbourhood Plan area has been designated for Bicton, Conover and Longden Parishes. Neighbourhood Plans for these areas are at various stages progression. Once 'made' these Neighbourhood Plans will be in conformity with and support the implementation of the strategy for their settlement, the Shrewsbury Place Plan area and that of the wider Shropshire Local Plan.
- 1.6. In identifying any site allocations to contribute to the achievement of the strategies proposed for Shrewsbury, Baschurch, Bayston Hill, Bicton, Bomere Heath, Cross Houses, Dorrington, Ford, Hanwood, Longden, Nesscliffe, a robust and proportionate site assessment

process was undertaken, which involved consideration of all reasonable site options at these settlements.

- 1.7. Through this site assessment process six proposed allocations are identified at Shrewsbury. The most recent iteration of this assessment work for Shrewsbury is summarised within Appendix 9 of GC44. The proposed site allocations are:
  - a. SHR054a which constitutes a proposed residential allocation.
  - b. SHR057 & SHR177 which constitutes a large proposed residential allocation.
  - c. SHR060, SHR158 & SHR161 which constitutes a proposed Sustainable Urban Extension for residential, employment, a new local centre and extensive green infrastructure.
  - d. SHR145 which constitutes a proposed residential allocation.
  - e. SHR173 which constitutes a large proposed residential allocation.
  - f. SHR166 which constitutes a large proposed employment allocation.
- 1.8. Also through this site assessment process two proposed allocations are identified at Baschurch (BNP024 and BNP035); two proposed allocations are identified at Bayston Hill (BAY039 and BAY050); one proposed allocation is identified at Bicton (BIT022); two proposed allocations are identified at Bomere Heath (BOM019 and BOM020); and one proposed allocation is identified at Ford (FRD011). These sites all constitute proposed residential allocations.
- 1.9. Within this site assessment process it was concluded that additional site allocations were unnecessary in order to achieve the proposed settlement strategies for Cross Houses, Dorrington Hanwood, Longden and Nesscliffe.
- 1.10. The most recent iteration of the assessment work for these settlements is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.11. A significant infrastructure project in the Shrewsbury Place Plan area is the proposed North West Relief Road (NWRR) at Shrewsbury. A resolution to grant planning permission (21/00924/EIA) for this development has been reached by Shropshire Council's planning committee, subject to completion of a Section 106 Legal Agreement. A Full Business Case for the project is expected to be considered by Full Council in September prior to submission to the Department for Transport. Subject to approval by the Department for Transport, construction is expected to commence in summer 2025.
- 1.12. The Shrewsbury Place Plan area generally has a strong functional relationship to the Black Country due to its geographic location,

quality of main road links, and migration and commuting patterns. As a result, Shrewsbury was identified as a potential location to accommodate proposed contributions to the Black Country.

- 1.13. A robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options within the identified assessment geography – including Shrewsbury. Through this process, SHR060, SHR158 & SHR161 was identified as an appropriate location to accommodate part of the proposed contribution to the Black Country. Specifically, it is proposed that SHR060, SHR158 & SHR161 accommodate 300 dwellings of the proposed contribution to the Black Country. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 1.14. 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.
- 1.15. Through the accommodation of part of the proposed contribution to the unmet housing need forecast to arise in the Black Country, they will also support the ability of the Black Country Authorities to meet their housing needs.
- 1.16. 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.
- 1.17. 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).
- 1.18. 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.

- 1.19. 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, presence of Green Belt within the Place Plan area, and the challenge of climate change, consistent with Chapter's 13-16 of the NPPF.

**Questions: Site Allocation SHR054a – Land south of Sundorne Road, Shrewsbury**

**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 Shrewsbury. It consists of an agricultural field and associated land. It is bounded by the curtilage of the Shrewsbury Club sports facility to the north; wooded belts to the east and south; and a lane to the west.
- 1.2. To inform the identification of proposed site allocations, including SHR054a, 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 9 of the additional Sustainability Appraisal (GC44).

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

- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 186 sites were considered at Shrewsbury. Within Stage 3 of the site assessment process, around 87 sites were considered at Shrewsbury.
- 1.11. SHR054a 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 Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHR054a was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the site and the assessment process undertaken to identify proposed allocation SHR054a.
- 1.14. In conclusion, Shropshire Council considers that SHR054a 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. SHR054a is proposed to be allocated for residential development. This site is some 3.86ha in size and the approximate site provision figure is some 60 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.1(i) of draft Policy S16.1 and the wider policies in the draft Shropshire Local Plan 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 S16.1(i) of draft Policy S16.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR054a.
- 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. To date, no planning application has been received on proposed allocation SHR054a.

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

**Shropshire Council Response:**

- 5.1. SHR054a 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 SHR054a 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 Shrewsbury 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. Provision of a pedestrian route from the Shropshire Way footpath to Sundorne Road.
  - b. Green infrastructure to create a buffer to the former Shrewsbury Canal and the environmental network which surrounds the site.
- 5.5. More generally, it is also considered that development of SHR054a 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 SHR054a 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 SHR054a.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR054a 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 SHR054a within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Woodland in proximity of the site for part of a local wildlife site. As such, site guidelines require green infrastructure to form an appropriate green buffer. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - b. Environmental network corridors are located on site boundaries. As such, site guidelines require green infrastructure to form an appropriate green buffer. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. There are boundary and in-sites trees present. As such, site guidelines require mature trees, hedgerows and priority habitats to be retained and form part of the green infrastructure network.
  - d. The site is in proximity of the former Shrewsbury Canal and other heritage assets. As such, site guidelines require the site design and layout to reflect and respect the sites heritage and heritage assets within the wider area; provision of green infrastructure to form an appropriate green buffer; and care to be taken so as not to compromise any potential future restoration of the Canal. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
  - e. Noise associated with the road to the east and sports facilities in proximity of the site. As such, site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to be used to appropriately manage noise, particularly associated with the A49.
  - f. Location within a mineral safeguarding area. This has been appropriately considered within the site assessment.
  - g. The site consists of best and most versatile agricultural land, although applying precautionary principle this applies to much of the land around Shrewsbury. This has been appropriately considered within the site assessment.
  - h. A small component of the site is located within the surface water flood risk zones. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - i. The site is deemed to have high landscape and medium-high visual sensitivity. This has been appropriately considered within the site assessment. Furthermore, site guidelines include a range of expectations on site design and layout to ensure they positively respond to and mitigate this matter.

- j. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on White Mere, Sweatmere and Crose Mere and Clarepool Moss (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.1.

**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 SHR054a.
- 7.4. With specific regard to flood risk at SHR054a, in summary:
  - a. With regard to fluvial flood risk, proposed allocation SHR054a is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 1% of proposed allocation SHR054a is located within the 30 and 100 year surface flood risk zones and around 2% of proposed allocation SHR054a is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for SHR054a within Schedule S16.1(i) of draft Policy S16.1 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 SHR054a. It concluded that the site SHR054a 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 SHR054a 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 SHR054a.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR054a 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 SHR054a within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site off Sundorne Road.
  - b. Providing necessary improvements to the local and strategic road network.

- c. Providing a pedestrian route from the Shropshire Way footpath to Sundorne Road.
  - d. Providing a green infrastructure buffer to the former Shrewsbury Canal and environmental networks around the site.
  - e. Retention and enhancement of the trees and hedgerows on and around the site.
  - f. 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 SHR054a. 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 SHR054a 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 A0043), the promoter of SHR054a stated "*assuming the above guideline of around 85 dwellings, we can confirm that the site will be highly deliverable and viable. There is strong interest from housing developers and the site is likely to be delivered within 3 years of adoption of the Plan.*"
- 9.4. It is noted that the approximate site provision for this site is some 60 dwellings rather than the 85 referenced within the above Representation. However, Shropshire Council remain of the opinion that this site is viable and deliverable in accordance with the proposed requirements of the draft Shropshire Local Plan.

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation SHR054a 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 2027/28 and continue until 2029/30. The Council also anticipates that development will progress at a rate of 38 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 SHR054a 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 SHR054a.
- 11.3. The boundary for SHR054a is defined by the curtilage of the Shrewsbury Club sports facility to the north; wooded belts to the east and south; and a lane 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 SHR054a within Schedule S16.1(i) of draft Policy S16.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SHR054a; 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 SHR054a.
- 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 SHR054a – 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 SHR054a.



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 SHR054a, 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 and comments on specific site guidelines proposed for SHR054a. These are summarised in SD014.01 and GC4o. Dealing with the main objections and comments in turn:

- a. 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.
- b. The site adjoins private water supplies and close to a spring, therefore drainage design and pollution prevention measures will be required. Shropshire Council notes this requirement which is reflected within the expectation that the site incorporates appropriate sustainable drainage, informed by a sustainable drainage strategy. Draft Policy DP19 provides further detail on this matter.

## **Questions: Site Allocation SHR057 & SHR177 – Land north of Mytton Oak Road, Shrewsbury**

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

### **Shropshire Council Response:**

- 1.1. This proposed allocation lies to the west of Shrewsbury. It consists of two agricultural fields and a farm complex. It is bounded by agricultural field boundaries and property curtilages to the north; Oak Lane and Rad Brook to the east; Mytton Oak Road to the south, and the A5 and agricultural field boundaries to west.
- 1.2. To inform the identification of proposed site allocations, including SHR057 & SHR177, 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 9 of the additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability:* Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.

- c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 186 sites were considered at Shrewsbury. Within Stage 3 of the site assessment process, around 87 sites were considered at Shrewsbury.
- 1.11. SHR057 & SHR177 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 SHR057 & SHR177 was identified as a

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

- 1.13. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the site and the assessment process undertaken to identify proposed allocation SHR057 & SHR177.
- 1.14. In conclusion, Shropshire Council considers that SHR057 & SHR177 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. SHR057 & SHR177 is proposed to be allocated for residential development. The proposed site allocation is some 19ha in size (although the total site assessed is larger) and the approximate site provision figure is some 400 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.1(i) of draft Policy S16.1 and the wider policies in the draft Shropshire Local Plan 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 S16.1(i) of draft Policy S16.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR057 & SHR177.
- 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. A Hybrid Planning Application (24/02808/OUT) is currently pending consideration on the majority of the site for 400 dwellings and an 80 bedroom care home. The full component of this planning application relates to 102 dwellings and the 80 bedroom care home. The outline component of this planning application relates to the remaining 298 dwellings.

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

**Shropshire Council Response:**

- 5.1. SHR057 & SHR177 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 SHR057 & SHR177 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 Shrewsbury 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, reflecting the objectives of the Shrewsbury Big Town Plan.

- b. Creation and enhancement of pedestrian and cycle links within and through the site, in this area of town and from the site into the town centre.
  - c. Ability to provide green infrastructure and open space which contributes to the objectives of the Shrewsbury Big Town Plan – including a green infrastructure buffer/setting for Bowbrook.
  - d. Delivery of additional playing pitch provision.
- 5.5. More generally, it is also considered that development of SHR057 & SHR177 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 SHR057 & SHR177 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 SHR057 & SHR177.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR057 & SHR177 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 SHR057 & SHR177 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Part of a very extensive environmental network is located on the site – associated with Severn Vyrnwy Floodplain. There are also mature trees on the site; potentially priority habitats/protected species; and mature tree, hedgerows and a watercourse on site boundaries. As such, site guidelines require mature trees, hedgerows and priority habitats to be retained and form part of the green infrastructure network. They also require green infrastructure to form an appropriate buffer of the Bowbrook and areas in flood zones 2 and/or 3 to form part of the green

infrastructure network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

- b. The site contains the medieval historic farmstead of Oak Farm and has archaeological potential. As such, site guidelines require the site design and layout to reflect and respect the sites heritage and heritage assets within the wider area. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
- c. Noise associated with roads to the south and west. As such, site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to be used to appropriately manage noise, particularly associated with the A5 and Mytton Oak Road.
- d. Location within a mineral safeguarding area. This has been appropriately considered within the site assessment.
- e. The site consists of best and most versatile agricultural land, although applying precautionary principle this applies to much of the land around Shrewsbury. This has been appropriately considered within the site assessment.
- f. Part of the site is located within flood zones 2 and/or 3 and the surface water flood risk zones (although much of this is beyond the extent of the component of the site proposed for allocation). Site guidelines specify that development will be excluded from the elements of the site located in Flood Zones 2 and/or 3, which will form part of the Green Infrastructure network. They also require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- g. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on White Mere, Sweatmere and Crose Mere and Clarepool Moss (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.1.

**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 SHR057 & SHR177.
- 7.4. With specific regard to flood risk at proposed allocation SHR057 & SHR177, in summary:
  - a. With regard to fluvial flood risk, around 3.6% of proposed allocation SHR057 & SHR177 is located within Flood Zone 3 and around 3.8% of proposed allocation SHR057 & SHR177 is located within Flood Zone 2 (please note these areas overlap).
  - b. With regard to other sources of flood risk, around 2% of proposed allocation SHR057 & SHR177 is located within the 30 and 100 year surface flood risk zones and around 5% of proposed allocation SHR057 & SHR177 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for SHR057 & SHR177 within Schedule S16.1(i) of draft Policy S16.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including SHR057 & SHR177. It concluded that the site SHR057 & SHR177 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 SHR057 & SHR177 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 SHR057 & SHR177.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR057 & SHR177 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 SHR057 & SHR177 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring the comprehensive development of the site, reflecting the objectives of the Shrewsbury Big Town Plan.
  - b. Providing an appropriate access off Mytton Oak Road.
  - c. Providing necessary improvements to the local and strategic road network.
  - d. Creation and enhancement of pedestrian and cycle links within and through the site, in this area of town and from the site into the town centre.
  - e. Ability to provide green infrastructure and open space which contributes to the objectives of the Shrewsbury Big Town Plan – including a green infrastructure buffer/setting for Bowbrook.
  - f. Delivery of additional playing pitch provision.

- g. Retention and enhancement of the trees, hedgerows and priority habitats on the site.
  - h. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHR057 & SHR177. 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 SHR057 & SHR177 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 appended to the Viability and Deliverability Topic Paper (EV113), the promoter of SHR057 & SHR177 stated "*These sites are viable and deliverable and the timescale is correct*".
- 9.4. The Council would also note that a Hybrid Planning Application (24/02808/OUT) is currently pending consideration on the majority of the site for 400 dwellings and an 80 bedroom care home. The full component of this planning application relates to 102 dwellings and the 80 bedroom care home. The outline component of this planning application relates to the remaining 298 dwellings.

**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 SHR057 & SHR177 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2035/36. The Council also anticipates that development will progress at a rate of 38 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, although it is acknowledged that given the scale of the site, the assumed delivery rate is cautious.
- 10.4. Shropshire Council would note that within correspondence appended to EV113, the promoter of SHR057 & SHR177 stated "*These sites are viable and deliverable and the timescale is correct*".
- 10.5. The Council would also note that a Hybrid Planning Application (24/02808/OUT) is currently pending consideration on the majority of the site for 400 dwellings and an 80 bedroom care home. The full component of this planning application relates to 102 dwellings and the 80 bedroom care home. The outline component of this planning application relates to the remaining 298 dwellings.

**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 SHR057 & SHR177 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 SHR057 & SHR177.
- 11.3. The boundary for SHR057 & SHR177 consists of agricultural field boundaries and property curtilages to the north; Oak Lane and Rad Brook to the east; Mytton Oak Road to the south, and the A5 and agricultural field boundaries to 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 SHR057 & SHR177 within Schedule S16.1(i) of draft Policy S16.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SHR057 & SHR177; 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 SHR057 & SHR177.
- 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 SHR057 & SHR177 – 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 SHR057 & SHR177.
- 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 SHR057 & SHR177, 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 both comments on specific site guidelines proposed for SHR057 & SHR177. These are summarised in SD014.01 and GC4o. These comments included:
- a. Site guidelines should require the developer to demonstrate how any new on-site facilities will be managed and maintained. Shropshire Council supports this principle and as such for the purposes of clarity an appropriate main modification is proposed within GC4m requiring the playing fields to be "*managed and maintained in perpetuity by way of legal agreement.*"
  - b. These sites are located within source protection zone 3, therefore appropriate mains foul and surface water drainage will be

required. Shropshire Council agrees that appropriate mains foul and surface water drainage will be required, but considers existing guidelines and wider policies in the draft Shropshire Local Plan provide appropriate certainty on this matter.

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

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

**Shropshire Council Response:**

- 1.1. This proposed allocation lies to the west of Shrewsbury and constitutes a new proposed sustainable urban extension to the town. It consists of the majority of the agricultural fields located in the area between Hanwood Road, Mytton Oak Road, the A5 and the existing built form of Shrewsbury.
- 1.2. As a result, the site boundaries are formed by agricultural field boundaries and Mytton Oak Road to the north; property curtilages, including the curtilage of a primary school, and agricultural field boundaries to the east; Hanwood Road to the south; and the A5 and agricultural field boundaries to the west.
- 1.3. To inform the identification of proposed site allocations, including SHR060, SHR158 & SHR161, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 9 of the additional Sustainability Appraisal (GC44).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability.

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

- 1.12. Within Stages 2a and 2b of the site assessment process, around 186 sites were considered at Shrewsbury. Within Stage 3 of the site assessment process, around 87 sites were considered at Shrewsbury.
- 1.13. SHR060, SHR158 & SHR161 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.14. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHR060, SHR158 & SHR161 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of SHR060, SHR158 & SHR161 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
  - a. The large pool on the eastern boundary/within SHR060 should constitute a Local Wildlife Site. Whilst this pool was recognised in the wider site assessment, it does not receive negative scoring within Stage 2 of the site assessment process. Shropshire Council considers the conclusions of Stage 2a of the site assessment process are robust and were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.
  - b. Concern about impact on highway infrastructure. Shropshire Council considers that the site assessment process gave appropriate consideration to highway matters, informed by analysis undertaken by Highways Officers. The site assessment summaries unambiguously document the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of SHR060, SHR158 & SHR161 as a proposed allocation.
  - c. Concern about delivery assumptions. SHR060, SHR158 & SHR161 is a large and complex site, so will take many years to be delivered, parts of the site have not yet been marketed / developer options are not in place, and Council assumptions are for delivery to extend beyond the proposed Plan period. Shropshire Council considers that the delivery assumptions for the site are entirely appropriate and have been informed by proactive engagement with the site promoter.



- 1.16. In conclusion, Shropshire Council considers that SHR060, SHR158 & SHR161 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

**Shropshire Council Response:**

- 2.1. SHR060, SHR158 & SHR161 is proposed to be allocated as comprehensive new Sustainable Urban Extension (SUE) comprising 103.82ha, providing mixed residential and employment development with 1,500 dwellings and 5ha of land for employment generating uses. 300 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 2.2. Detailed development guidelines within Schedule S16.1(i) of draft Policy S16.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this proposed SUE.
- 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.
- 2.4. The specific employment mix on the site would be particularly influenced by the development guidelines within Schedule S3.1(i) of draft Policy S3.1 and draft Policies SP1; SP2; SP13 and SP14 and the employment uses should principally be within the primary use classes of E(g), B8 and appropriate sui generis uses.
- 2.5. The development guidelines indicate the employment land constitute a minimum of 5ha of the site, utilising opportunities associated with the creation of any new 'Park and Ride' facility, and focussing on the delivery of high quality and flexible employment provision. In this way, the employment development will be expected to complement the employment opportunities in Shrewsbury and contribute towards the objectives of the Shropshire Economic Growth Strategy.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S16.1(i) of draft Policy S16.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of SHR060, SHR158 & SHR161.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

- 4.1. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site, with two Statements of Common Ground (SoCG03) having been completed between the two parties.
- 4.2. Significant progress has been made on masterplanning for the site and Shropshire Council understands the site promoter is intending to submit an application on adoption of the Shropshire Local Plan.

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

**Shropshire Council Response:**

- 5.1. SHR060, SHR158 & SHR161 is a proposed mixed-use Sustainable Urban Extension (SUE) allocation for 1,500 dwellings and 5ha of employment land. 300 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 5.2. As such, key benefits of the proposed development include:
  - a. The provision of housing to contribute to meeting the needs of all groups within the town and other communities in the Place Plan

- area. This includes the need for local employer and key worker housing.
- b. Supporting the housing needs of the Black Country, through the accommodation of part of the proposed contribution to the unmet housing needs forecast to arise in the Black Country.
  - c. The provision of high quality and flexible employment, providing employment opportunities for residents of the town and other communities in the Place Plan area. This will complement the employment opportunities in Shrewsbury and contribute towards the objectives of the Shropshire Economic Growth Strategy.
- 5.3. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for the development of SHR060, SHR158 & SHR161 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of Shrewsbury and Shropshire.
- 5.4. The sites location, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.5. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. Ensuring the comprehensive development of the site, including housing; high quality and flexible employment in an accessible location; a new local centre comprising an appropriate range of neighbourhood shopping facilities; other services and facilities – including education and medical; and extensive areas of green infrastructure and open space. Non-residential development will form an intrinsic component of the development, occurring alongside and cross-subsidised by housing.
  - b. Delivery of opportunities to enhance the town’s ‘Park and Ride’ on the north of the site.
  - c. Providing 4ha of land adjacent to the new Bowbrook Primary School/Keystone Academy Education Campus for new education facilities on the site.
  - d. If required, 0.5ha of land for a new medical centre on the site.
  - e. Enhancing existing and providing new green infrastructure corridors through the site, thereby retaining mature trees, hedgerows, priority habitats and public rights of way and contributing to the Shrewsbury Big Town Plan strategy.

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

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

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing SHR060, SHR158 & SHR161 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR060, SHR158 & SHR161.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR060, SHR158 & SHR161 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There is a need for a new circular link road, between the existing radial roads of Mytton Oak Road and Hanwood Road, to facilitate public transport movements and improve accessibility by private car. Site guidelines require creation of appropriate accesses to both Hanwood Road and Mytton Oak Road and an associated circular link road sufficient to sustain a bus route, potentially linked to the creation of a new 'Park and Ride' facility to the north of the site.
  - b. The site contains a large pool which is priority habitat, grassland which may be priority habitat, and part of the environmental network. There are scattered field trees and hedgerows present. As such, site guidelines require appropriate green infrastructure buffers of environmental networks on the east of the site and enhancement of existing and provision of new green infrastructure corridors through the site - thereby retaining mature trees, hedgerows, priority habitats and public rights of way. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. Noise associated with roads on and near site boundaries. As such, site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to be used to appropriately manage noise, particularly associated with these sources.
  - d. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this also applies to much of the land around Shrewsbury. This has been appropriately considered within the site assessment.
  - e. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - f. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on White Mere, Sweatmere and Crose Mere and Clarepool Moss (possibly others). The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.1.
  - g. The site contains a Grade II listed building (Upper Edgebold farmhouse), other heritage assets and has archaeological potential. As such, site guidelines require the site design and layout to reflect and respect the sites heritage and heritage assets within the wider area. Furthermore, draft Policy DP23

ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.

- h. A small part of the site is located within a Grade 3 Source Protection Zone. Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in Source Protection Zones.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation SHR060, SHR158 & SHR161 provides further information on the site assessment process.
- 7.4. In summary, SHR060, SHR158 & SHR161 is located entirely within Flood Zone 1, which is the area with lowest risk of flooding. With regard to other forms of flood risk:
  - a. Around 1% of SHR060, 3% of SHR158 and 7% of SHR161 lie within the 30 year surface flood risk zone.
  - b. Around 2% of SHR060, 5% of SHR158 and 8% of SHR161 lies within the 100 year surface flood risk zone.
  - c. Around 4% of SHR060, 10% of SHR158 and 13% of SHR161 lies within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 address site specific flood risk issues, stating: *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*

- 7.6. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation SHR060, SHR158 & SHR161 passed the sequential test and the exception test was not required.
- 7.7. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 address this issue further, stating "*The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.*"

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of SHR060, SHR158 & SHR161 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR060, SHR158 & SHR161.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR060, SHR158 & SHR161 constituted an appropriate proposed Sustainable Urban Extension (SUE) allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment

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

8.5. The site guidelines include:

- a. Ensuring the comprehensive development of the site, including housing; high quality and flexible employment in an accessible location; a new local centre comprising an appropriate range of neighbourhood shopping facilities; other services and facilities – including education and medical; and extensive areas of green infrastructure and open space. Non-residential development will form an intrinsic component of the development, occurring alongside and cross-subsidised by housing.
- b. Providing a new local centre comprising an appropriate range of neighbourhood shopping facilities.
- c. Delivery of opportunities to enhance the town's 'Park and Ride' on the north of the site.
- d. Providing 4ha of land adjacent to the new Bowbrook Primary School/Keystone Academy Education Campus for new education facilities on the site.
- e. If required, 0.5ha of land for a new medical centre on the site.
- f. Enhancing existing and providing new green infrastructure corridors through the site, thereby retaining mature trees, hedgerows, priority habitats and public rights of way and contributing to the Shrewsbury Big Town Plan strategy.
- g. Providing appropriate green infrastructure buffers of environmental networks on the east of the site, thereby contributing to the Shrewsbury Big Town Plan strategy.
- h. Creation of appropriate accesses to both Hanwood Road and Mytton Oak Road and an associated circular link road sufficient to sustain a bus route, potentially linked to the creation of a new 'Park and Ride' facility to the north of the site.
- i. Providing necessary improvements to the local and strategic highway network.
- j. Creating and enhancing pedestrian, cycle and vehicular links to and through the site; and within this area of the town to the town centre.
- k. Appropriately buffering noise, including from roads on and near site boundaries.
- l. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.



- 8.6. Shropshire Council expects these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. A Statement of Common Ground (SoCG03) has been completed between Shropshire Council and the site promoter. It addresses key infrastructure requirements and demonstrate the site is viable and deliverable.
- 8.8. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHR060, SHR158 & SHR161. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.9. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.10. Other draft policies of particular relevance include:
  - a. Policies SP3 and DP11 which address climate change and carbon emissions.
  - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
  - c. Policies DP12 – DP24 which address the natural and historic environment.
  - d. Policies DP27 and DP28 which address broadband, communications and transport infrastructure.

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

**Shropshire Council Response:**

- 9.1. Yes. Shropshire Council considers site SHR060, SHR158 & SHR161 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).

- 9.3. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0356), the promoter of SHR060, SHR158 & SHR161 state *"CEG is an experienced national strategic land promoter with a proven track record of delivering major sustainable urban extensions. There are no abnormal costs or technical constraints that would render the development of the site unviable or undeliverable..."*
- 9.4. They also state *"In respect of deliverability, CEG is fully committed to preparing a masterplan, submitting a planning application and bringing forward the site for development as soon as possible. Some early discussions with housebuilders have taken place to date, and it is expected that a significant proportion of the site will be brought forward early in the plan period."*
- 9.5. A Statement of Common Ground (SoCG03) has been completed between Shropshire Council and the site promoter, which provide further confidence on the viability and deliverability of the site.
- 9.6. In particular, paragraphs 6.1-6.3 of SoCG03 include:  
*"The Parties confirm that the proposed site allocation is both viable and deliverable. The Parties have extensively reviewed the policy requirements and 'Development Guidelines' provided in respect of the Site's allocation in the Regional 18 Pre-Submission Draft Shropshire Local Plan and do not anticipate any issues in the Site's deliverability or viability in this respect.*  
*The site is capable of supporting policy compliant affordable housing provision (20%), together with the anticipated infrastructure improvements, s106 contributions and CIL payments.*  
*Shropshire Council and the parties have continued to liaise proactively regarding the viability and deliverability of this site during the Local Plan Review process and as a result it is agreed that at this stage of the process this site is viable and deliverable, having given due regard to the proposed site guidelines and policy requirements within the draft Shropshire Local Plan."*

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation SHR060, SHR158 & SHR161 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).

- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue beyond the proposed plan period. The Council also anticipates that development will progress at a rate of up to 114 dwellings per annum, recognising the scale of the site and the number of potential outlets.
- 10.3. It is recognised that this is a more conservative view than the site promoter, which anticipates completion rates of up to 125 dwellings per annum and build-out of the residential component of the site to occur within the proposed plan period – as documented within the Statements of Common Ground (SoCG03) between the two parties.
- 10.4. Paragraphs 6.4 and 6.6 of the SoCG03 address this matter, including: *"It is proposed that delivery of the residential element of the site is likely to be provided by a number of housebuilders, together with specialist provision of local centre uses and employment uses by commercial developers."* And *"Build out rates are expected to peak at a combined figure of 125 dwellings p.a. throughout years 2025/6 through 2034/35 with completion of the residential elements by 2036/2037."*
- 10.5. Shropshire Council considers its 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 SHR060, SHR158 & SHR161 is entirely appropriate and there is no justification for its amendment.
- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR060, SHR158 & SHR161.
- 11.3. The boundary for SHR060, SHR158 & SHR161 is defined by agricultural field boundaries and Mytton Oak Road to the north; property curtilages, including the curtilage of a primary school, and agricultural field boundaries to the east; Hanwood Road to the south; and the A5 and agricultural field boundaries to the west.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for SHR060, SHR158 & SHR161 within Schedule S16.1(i) of draft Policy S16.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SHR060, SHR158 & SHR161; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR060, SHR158 & SHR161.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of SHR060, SHR158 & SHR161 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of SHR060, SHR158 & SHR161.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on SHR060, SHR158 & SHR161, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of 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 comments (both in support and objection) to specific site guidelines proposed for SHR060, SHR158 & SHR161. These are summarised in SD014.01 and GC4o. Dealing with the main objections in turn:
- a. The large pool and other natural habitats on the site should be protected through creation of a Green Infrastructure corridor. Shropshire Council considers the proposed site guidelines appropriately address this matter, requiring appropriate green infrastructure buffers of environmental networks on the east of the site and enhancement of existing and provision of new green infrastructure corridors through the site - thereby retaining mature trees, hedgerows, priority habitats and public rights of way.
  - b. Essential that appropriate flexibility is provided on the mix of uses proposed on the site. Shropshire Council considers proposed site guidelines strike an appropriate balance between providing flexibility and certainty on the proposed mix of uses expected on the site.
  - c. Consider the amount of employment on the site should be expressed as 5ha rather than a minimum of 5ha. Shropshire Council considers that to achieve an appropriate mixed-use development and recognising opportunities on the site, it is appropriate to express the employment land guideline as a minimum. This will ensure the greatest opportunity to deliver an appropriate range of high quality and flexible employment uses, potentially as part of an enhancement to the town's 'Park and Ride' offer to the north of the site.
  - d. Recognise need for a masterplan, but greater clarity required regarding approval process. Shropshire Council considers that

the proposed site guideline is clear on requirements for masterplanning and subsequent Council agreement of this work.

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

appropriately informed by the site assessment process and continued proactive engagement with infrastructure providers.

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

### **Questions: Site Allocation SHR145 – Land south of Meole Brace Retail Park, Shrewsbury**

**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 of Shrewsbury. It consists of a field crossed by the access to the adjoining Meole Brace 'Park and Ride' facility. It is bounded by Meole Brace retail park to the north; the railway line to the east – beyond which is the existing Shrewsbury South Sustainable Urban Extension which is currently the subject of development; Meole Brace 'Park and Ride' to the south; and Hereford Road – beyond which are existing dwellings to the west.
- 1.2. The site was granted Planning Permission (19/04389/OUT and 22/04331/REM) for 150 dwellings at appeal and development is currently ongoing.

- 1.3. To inform the identification of proposed site allocations, including SHR145, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 9 of the additional Sustainability Appraisal (GC44).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.



- 1.9. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 186 sites were considered at Shrewsbury. Within Stage 3 of the site assessment process, around 87 sites were considered at Shrewsbury.
- 1.12. SHR145 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHR145 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representation during the Regulation 19 Pre-Submission Consultation included objection to this site assessment. This primarily related to the fact that the quantum of development proposed could be achieved without the need for this site. 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 SHR145 as a proposed allocation.

- 1.15. In conclusion, Shropshire Council considers that SHR145 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. SHR145 is proposed to be allocated for residential development. This site is some 5.83ha in size and the approximate site provision figure is some 150 dwellings.
- 2.2. The site was granted Planning Permission (19/04389/OUT and 22/04331/REM) for 150 dwellings at appeal and development is currently ongoing.

**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 S16.1(i) of draft Policy S16.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR145.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.
- 3.4. The site was granted Planning Permission (19/04389/OUT and 22/04331/REM) for 150 dwellings at appeal and development is currently ongoing.

**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. The site was granted Planning Permission (19/04389/OUT and 22/04331/REM) for 150 dwellings at appeal and development is currently ongoing.

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

**Shropshire Council Response:**

- 5.1. SHR145 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 SHR145 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 Shrewsbury and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Providing an appropriate access to the site off Hereford Road to serve the development and adjoining Meole Brace 'Park and Ride.'
  - b. Ability to provide green infrastructure and open space – including a buffer to the railway line, Meole Brace 'Park and Ride,' the A5 (beyond the Meole Brace 'Park and Ride'), Hereford Road and Meole Brace Retail Park.
- 5.5. More generally, it is also considered that development of SHR145 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 SHR145 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 SHR145.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR145 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 SHR145 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Location within the Coal Authority reference area and 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, this also applies to much of the land around Shrewsbury. 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. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - d. The site could have either a positive or negative impact on access to Meole Brace 'Park and Ride.' Site guidelines require provision of an appropriate access to the site off Hereford Road to serve the development and adjoining Meole Brace 'Park and Ride.'
  - e. Mature trees and hedgerows border the site. As such, site guidelines require their retention as part of the Green Infrastructure provision on the site. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

- f. Noise associated with the railway line, Meole Brace 'Park and Ride,' the A5 (beyond the Meole Brace 'Park and Ride'), Hereford Road and Meole Brace Retail Park. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to form an appropriate green buffer of the railway line. 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 SHR145.
- 7.4. With specific regard to flood risk at SHR145, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 1% of the site is located within the 30 and 100 year surface flood risk zones and around 4% of the site is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for SHR145 within Schedule S1.1(i) of draft Policy S1.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*

- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including SHR145. It concluded that the site SHR145 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 SHR145 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 SHR145.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR145 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 SHR145 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site off Hereford Road to serve the development and adjoining Meole Brace 'Park and Ride.'

- b. Providing necessary improvements to the local and strategic road network.
  - c. Providing green infrastructure and open space – incorporating mature trees, hedgerows and priority habitats and including a buffer to the railway line, Meole Brace 'Park and Ride,' the A5 (beyond the Meole Brace 'Park and Ride'), Hereford Road and Meole Brace Retail Park.
  - d. 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 SHR145. 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 SHR145 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 A0036), the promoter of SHR145 stated *"The Site is controlled under a single ownership and as such is immediately available to contribute towards the identified housing need. The Site represents a viable and deliverable option which can be brought forward within the short term (0-5) years."*
- 9.4. It also states, *"the Site represents a deliverable and suitable opportunity to deliver residential development on a smaller site, within a sustainable location, meeting the objectives and commitments of the Reg 19 Local Plan which can be delivered in the short term."*
- 9.5. The Council would note that Planning Permission (19/04389/OUT and 22/04331/REM) for 150 dwellings at appeal and development is currently ongoing.

**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 SHR145 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 would note that Planning Permission (19/04389/OUT and 22/04331/REM) for 150 dwellings at appeal and development is currently ongoing.
- 10.3. The Council anticipates development will be completed by 2025/26, with completion rates reaching 57 dwellings per annum, consistent with standard assumptions for this scale of site in this part of Shropshire. 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 A0036), the promoter of SHR145 stated *"The Site is controlled under a single ownership and as such is immediately available to contribute towards the identified housing need. The Site represents a viable and deliverable option which can be brought forward within the short term (0-5) years."*



10.5. It also states, *"the Site represents a deliverable and suitable opportunity to deliver residential development on a smaller site, within a sustainable location, meeting the objectives and commitments of the Reg 19 Local Plan which can be delivered in the short term."*

**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 SHR145 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 SHR145.
- 11.3. The boundary for SHR145 is defined by Meole Brace retail park to the north; the railway line to the east – beyond which is the existing Shrewsbury South Sustainable Urban Extension which is currently the subject of development; Meole Brace 'Park and Ride' to the south; and Hereford Road – beyond which are existing dwellings 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 SHR145 within Schedule S16.1(i) of draft Policy S16.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SHR145; 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 SHR145.

- 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 SHR145 – 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 SHR145.
- 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 SHR145, which is a ‘golden thread’ through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection of specific site guidelines proposed for SHR145. These are summarised in SD014.01 and GC4o.

## 12.9. In summary:

- a. Greater clarity required in relation to access to the site. Shropshire Council considers the proposed site guidelines provide appropriate and clear requirements for accesses into the site. They include a requirement for an appropriate vehicular access off Hereford Road to serve the development and the adjacent park and ride site.
- b. Greater clarity required in relation to protection of mature trees, hedgerows and priority habitats. Shropshire Council considers the proposed site guidelines provide appropriate and clear requirements for accesses into the site. They include a requirement for mature trees, hedgerows and priority habitats to be retained and form part of the green infrastructure network.
- c. Greater clarity required in relation to noise mitigation. Shropshire Council considers the proposed site guidelines provide appropriate and clear requirements for accesses into the site. They include a requirement for acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise arising, including from the adjacent Meole Brace Retail Park, Hereford Road, A5, the railway line and the Park and Ride. This will need to be suitably evidenced following Good Acoustic Design principles set out in ProPG and associated supplementary guidance ahead of any grant of planning approval.

### **Questions: Site Allocation SHR173 – Land west of Ellesmere Road, Shrewsbury**

**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 Shrewsbury. It consists of five agricultural fields and is bounded a wooded belt to the north to the north, Ellesmere Road to the east, property curtilages and agricultural field boundaries to the south, and the railway line corridor to the west.
- 1.2. To inform the identification of proposed site allocations, including SHR173, 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 9 of the additional Sustainability Appraisal (GC44).

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

- d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 186 sites were considered at Shrewsbury. Within Stage 3 of the site assessment process, around 87 sites were considered at Shrewsbury.
- 1.11. SHR173 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 Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHR173 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 SHR173. These objections are summarised in SD014.01 and GC4o. They included:
- a. Unclear/insufficient justification for allocation of SHR173 over other sites. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of SHR173 as a proposed allocation.
  - b. The site is too large and should be reduced / there is a lack of demand. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of SHR173 as a proposed allocation.
  - c. Reliance on the North West Relief Road (NWRR) to facilitate delivery creates too much uncertainty (timescales, funding and environmental impacts). Shropshire Council considers delivery assumptions for this site are realistic and robust. The NWRR is a priority project for the Council and a resolution to grant planning

permission (21/00924/EIA) has been reached by planning committee, subject to completion of a Section 106 Legal Agreement. A Full Business Case for the project is expected to be considered by Full Council in September prior to submission to the Department for Transport. Subject to approval by the Department for Transport, construction is expected to commence in summer 2025.

- d. Insufficient infrastructure, service and facility capacity, including that proposed as part of the development, to support this development. Shropshire Council considers the site assessment process gave appropriate consideration to infrastructure constraints and opportunities. This site assessment process fully justifies the identification of SHR173 as a proposed allocation.
- e. Environmental impacts and loss of amenity value - specific reference to wildlife and wildlife corridors on the site; and nearby local wildlife sites, Sites of Special Scientific Interest (SSSI's) and Special Areas of Conservation (SAC's), mean it is unsuitable for development. Shropshire Council considers that the site assessment process gave appropriate consideration to environmental constraints and opportunities. This site assessment process fully justifies the identification of SHR173 as a proposed allocation.
- f. Unacceptable climate change impact. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of SHR173 as a proposed allocation.
- g. Conclusions of Stage 2a of the site assessment process are incorrect, inconsistent with that for other sites, and do not support allocation of SHR173. 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. This site assessment process fully justifies the identification of SHR173 as a proposed allocation.

1.14. In conclusion, Shropshire Council considers that SHR173 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. SHR173 is proposed to be allocated for comprehensive residential development. This site is some 23.30ha in size and the approximate site provision figure is some 450 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.1(i) of draft Policy S16.1 and the wider policies in the draft Shropshire Local Plan 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.
- 2.4. An Outline Planning Application (22/01432/OUT) is currently pending consideration on the site for 450 dwellings.

**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 S16.1(i) of draft Policy S16.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR173.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.
- 3.4. An Outline Planning Application (22/01432/OUT) is currently pending consideration on the site for 450 dwellings.

**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 and a

Statement of Common Ground (SoCG12) has been completed between the two parties.

- 4.2. An Outline Planning Application (22/01432/OUT) is currently pending consideration on the site for 450 dwellings.

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

**Shropshire Council Response:**

- 5.1. SHR173 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 SHR173 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 Shrewsbury 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.
  - b. Supporting the delivery of the North West Relief Road (NWRR).
  - c. Providing a new local centre is an accessible location to support pedestrian and cycle access by nearby residents.
  - d. Delivery of enhanced and new pedestrian and cycle link to and through the site.
  - e. Ability to provide green infrastructure and open space, including enhancements to the Old Riverbed Local Wildlife Site and environmental networks in and around the site – supporting the objectives of the Shrewsbury Big Town Plan.
  - f. Delivery of additional playing pitches, in line with the Council’s Playing Pitch and Outdoor Strategy.



- 5.5. More generally, it is also considered that development of SHR173 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 SHR173 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 SHR173.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR173 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 SHR173 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Highway capacity of Ellesmere Road is limited and air quality must be protected. Site guidelines stipulate that development of the site will not commence until such time as the North West Relief Road is operational – although the Council is proposing a main modification within the response to Question 12 on this site to recognise that this is *"unless up-to-date transport evidence were to suggest otherwise."*
  - b. A component of the site is located within the fluvial and surface water flood risk zone. Site guidelines require development to be excluded from Flood Zones 2 and/or 3, which will form part of the Green Infrastructure network. They also require sustainable drainage and flood risk mitigation measures, with any residual surface water flood risk managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network.
  - c. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on White Mere, Sweatmere and Crose Mere and

Clarepool Moss (possibly others) and recreation impacts on Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.1.

- d. The north-western corner of the site contains part of a Local Wildlife Site (and environmental network). There are also environmental network corridors along site boundaries. As such, site guidelines require green infrastructure to enhance the Old Riverbed Local Wildlife Site and environmental networks in and around the site. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- e. The site contains mature trees and hedgerows. As such, site guidelines require mature trees, hedgerows and priority habitats to be retained as part of the Green Infrastructure network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- f. The site may have archaeological interest. As such, site guidelines require site design and layout will reflect and respect the site's heritage and heritage assets within the wider area.
- g. Located within the mineral safeguarding area. This has been appropriately considered within the site assessment.
- h. Noise associated with the adjoining railway line and roads. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to manage this and any other sources of noise.
- i. Applying precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to much of the land around Shrewsbury. This has been appropriately considered within the site assessment.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared

a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.

- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR173.
- 7.4. With specific regard to flood risk at SHR173, in summary:
  - a. With regard to fluvial flood risk, around 6% of the site is located within Flood Zones 2 and 3 (which overlap).
  - b. With regard to other sources of flood risk, around 3% of the site is located within the 30 and 100 year surface flood risk zones and around 4% of the site is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for SHR173 within Schedule S16.1(i) of draft Policy S16.1 address this issue, stating:

*"Sustainable drainage and flood risk mitigation measures will be incorporated into the site. 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.*

*Development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, which will form part of the Green Infrastructure network."*
- 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 SHR173. It concluded that the site SHR173 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 SHR173 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 SHR173.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHR173 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 SHR173 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring the comprehensive development of the site.
  - b. Providing an appropriate access and necessary improvements to the local and strategic road network – including supporting the delivery of the North West Relief Road (NWRR).
  - c. Providing a new local centre is an accessible location to support pedestrian and cycle access by nearby residents.
  - d. Delivering enhanced and new pedestrian and cycle link to and through the site.
  - e. Providing green infrastructure and open space, including enhancements to the Old Riverbed Local Wildlife Site and environmental networks in and around the site – supporting the objectives of the Shrewsbury Big Town Plan.
  - f. Delivering additional playing pitches, in line with the Council’s Playing Pitch and Outdoor Strategy.
  - g. Retention and enhancement of trees and hedgerows on the site.

- h. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. With the exception of the NWRR (the delivery of which should be supported by the development), 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 SHR173. 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 SHR173 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 A0608), the promoter of SHR173 stated " *To conclude, Barwood Land can confirm that the Site is viable, available and achievable, and is expected to deliver housing in accordance with the policy requirements identified within the 'Regulation 18: Pre-Submission Draft Shropshire Local Plan'.*"
- 9.4. Further, support is provided within the Statement of Common Ground (SoCG12) which includes:
- a. At paragraph 3.2, "*There are no known legal nor land ownership restrictions that would prevent the immediate development of this site. It is available for immediate development.*"
  - b. At paragraph 5.7 "*Shropshire Council has undertaken some detailed Viability work to inform the emerging Shropshire Local Plan. This is included in submission document EV115.01-03 and updated Viability Note GC49 in June 2024. The Promoter made Representations to the Local Plan Delivery & Viability Study pre-consultation draft in February 2020, and notwithstanding those comments, it is the Promoter's view that the Site can be viably delivered.*"
- 9.5. The Council would also note that an Outline Planning Application (22/01432/OUT) is currently pending consideration on the site for 450 dwellings.

**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 SHR173 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 2027/28 and continue until 2037/38. The Council also anticipates that development will progress at a rate of up to 57 dwellings per annum, consistent with standard assumptions for this scale 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. Although, it is recognised that this is a more conservative view than the site promoter, which anticipates commencement in 2025/26, completion in 2030 and rates of up to 100 dwellings per annum – as

documented within the Statement of Common Ground (SoCG12) between the two parties.

- 10.5. The Council would note that an Outline Planning Application (22/01432/OUT) is currently pending consideration on the site for 450 dwellings.

**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 SHR173 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 SHR173.
- 11.3. The boundary for SHR173 is defined by a wooded belt to the north to the north, Ellesmere Road to the east, property curtilages and agricultural field boundaries to the south, and the railway line 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 SHR173 within Schedule S16.1(i) of draft Policy S16.1 are effective, justified and consistent with national policy.
- 12.2. However, the Council has given further consideration to the proposed site guideline restricting commencement of the development until such time as the North West Relief Road is operational – informed by discussions with the site promoter and the Local Highway Authority, and further technical assessment prepared by the site promoter.
- 12.3. As a result, Shropshire Council would support a main modification to the first draft site guideline for this site, with regard to commencement and delivery of the North West Relief Road, as follows:

*To ensure suitable access arrangements are achieved as well as protecting local amenity value on Ellesmere Road, the delivery of*

*this development is directly dependent on the approval and construction of the North West Relief Road. Development on the site will not commence until such time as the North West Relief Road is operational **unless up-to-date transport evidence were to suggest otherwise.***

- 12.4. These guidelines address the key requirements and considerations for the development of SHR173; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.5. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SHR173.
- 12.6. 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).
- 12.7. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.8. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of SHr173 – 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 SHR173.
- 12.9. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on SHR173, 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.
- 12.10. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included both objections and support for specific site guidelines proposed for SHR173. These are summarised in SD014.01 and GC4o. Dealing with the main objections in turn:
- a. Site guideline holding commencement of development until such time as the North West Relief Road is operational is overly restrictive. Shropshire Council has proposed a relevant main modification within this response.
  - c. Site capacity is too low, it should be 500 rather than 450 dwellings. 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. Furthermore, the Council would note the Outline Planning Application (22/01432/OUT) is for 450 dwellings.
  - d. Requiring a masterplan to be completed before determination of any planning application is overly restrictive. Shropshire Council considers that it is entirely appropriate for a scheme of this size to be supported by a comprehensive masterplan and adopted by Shropshire Council. The Council would note that the site promoter has undertaken significant masterplanning work to date.
  - e. Support provision of a local centre, but greater flexibility should be provided to allow a single retail outlet to maximise suitability and attractiveness. Shropshire Council considers that the

existing proposed site guidelines regarding the proposed local centre are appropriate.

- f. Site guideline regarding playing pitch provision is unclear. Shropshire Council considers proposed guidelines provides clear expectations for playing pitch provision.
- g. Site guidelines should require the developer to demonstrate how any new on-site playing pitch facilities will be managed and maintained. Shropshire Council supports this principle and an appropriate main modification is proposed within CG4m.

### **Questions: Site Allocation BNP024 – Land west of Shrewsbury Road, Baschurch**

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

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

- 1.1. This proposed allocation lies to the west of the village of Baschurch. It consists of the majority of an agricultural field. It is bounded by agricultural field boundaries to north and west; Milford Road to the south; and property curtilages and land identified for a new medical centre to the east.
- 1.2. To inform the identification of proposed site allocations, including BNP024, 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 Q (SD006.18) 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 Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.

- 1.10. Within Stages 2a and 2b of the site assessment process, around 28 sites were considered at Baschurch. Within Stage 3 of the site assessment process, around 18 sites were considered at Baschurch.
- 1.11. BNP024 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 BNP024 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included significant objection to the site assessment process undertaken to identify proposed allocation BNP024 or the proposed allocation itself.
- 1.14. In conclusion, Shropshire Council considers that BNP024 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. BNP024 is proposed to be allocated for residential development. This site is some 2.71ha in size and the approximate site provision figure is some 35 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 S16.2(i) of draft

Policy S16.2 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 BNP024.

- 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. To date, no planning application has been received on proposed allocation BNP024.

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

**Shropshire Council Response:**

- 5.1. BNP024 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 BNP024 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 Baschurch 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. Provision of significant green infrastructure and open space.
  - b. Financial contributions towards provision of a new medical centre on adjoining land – subject to ongoing discussions with the Integrated Care Board (ICB).
  - c. Ability to enhance pedestrian, cycle and vehicular links in the village.
- 5.5. More generally, it is also considered that development BNP024 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 BNP024 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 BNP024.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BNP024 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 BNP024 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. The site contains part of an environmental network corridor, mature trees and hedgerows; and is in proximity of a pond. As such, site guidelines require a low density development with significant open space and mature trees, hedgerows and priority habitats to be retained as part of the green infrastructure network.
  - b. Site is in setting of Prescott Conservation Area and may have archaeological potential. As such, site guidelines require

development to reflect and respect the sites heritage and heritage assets within the wider area.

- c. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool, White Mere, Sweatmere and Crose Mere; and Fenemere. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2.
- d. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
- k. The site consists of best and most versatile agricultural land, although this also applies to the majority of the land around Baschurch. This has been appropriately considered within the site assessment.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation BNP024.
- 7.4. With specific regard to flood risk at BNP024, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, the site is not located within any of the surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed

allocations including BNP024. It concluded that the site BNP024 passed the sequential test and that there is no requirement for the exception test.

- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of BNP024 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 BNP024.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BNP024 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 BNP024 within Schedule S16.2(i) of draft Policy S16.2 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 necessary improvements to the road network, including to the main access junction onto Shrewsbury Road.
  - b. Providing pedestrian and cycle and vehicular accesses and links.
  - c. Providing green infrastructure and open space.
  - d. Supporting the delivery of a medical centre.



- 8.6. With the exception of the medical centre, which this scheme is intended to contribute towards, 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 BNP024. 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 BNP024 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation BNP024 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 35 dwellings per annum, generally 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 BNP024 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 BNP024.
- 11.3. The boundary for BNP024 is defined agricultural field boundaries to north and west; Milford Road to the south; and property curtilages and land identified for a new medical centre to the east.

**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 BNP024 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BNP024; 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 BNP024.
- 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 BNP024 – 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 BNP024.
- 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 BNP024, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.

- e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to the approximate site provision figure which forms part of the site guidelines proposed for BNP024. This objection considered the figure was too low.
- 12.9. Shropshire Council considers the proposed capacity is appropriate and is responsive to the sites 'edge of village' location and the need for over-provision of open space. Furthermore, suitable flexibility is provided within draft Policy S16.2 which recognises site provision figures are 'approximate'.
- 12.10. 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.

**Questions: Site Allocation BNP035 – Land east of Prescott Fields, Baschurch**

**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 the village of Baschurch. It consists of part of an agricultural field. It is bounded by an agricultural field boundary to the south; an access track beyond which is property curtilages to the west; and the extent of the proposed allocation to the north and east.
- 1.2. To inform the identification of proposed site allocations, including BNP035, 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 Q (SD006.18) 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 Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 28 sites were considered at Baschurch. Within Stage 3 of the site assessment process, around 18 sites were considered at Baschurch.
- 1.11. BNP035 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 BNP035 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to proposed allocation BNP035. This was due to concern that there is insufficient infrastructure, services and facilities to support the development and windfall development could accommodate these numbers.
- 1.14. Shropshire Council considers that the proposed allocation was informed by a proportionate and robust site assessment process which included consideration of infrastructure needs and opportunities – as reflected within proposed site guidelines. The assessment process undertaken and conclusions reached are unambiguously documented within the assessment summaries. This site assessment process fully justifies the identification of BNP035 as a proposed allocation.
- 1.15. In conclusion, Shropshire Council considers that BNP035 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. BNP035 is proposed to be allocated for residential development. This site is some 1.16ha in size and the approximate site provision figure is some 20 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 S16.2(i) of draft Policy S16.2 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 BNP035.
- 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. To date, no planning application has been received on proposed allocation BNP035.

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

**Shropshire Council Response:**

- 5.1. BNP035 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 BNP035 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 Baschurch and Shropshire.
- 5.3. The site location, extent and proposed boundaries (informed by proposed site guidelines), 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. This includes opportunities to conserve and interpret the nearby Grade II listed coffin support.
- 5.5. More generally, it is also considered that development of BNP035 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 BNP035 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 BNP035.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BNP035 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 BNP035 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process



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

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Site boundaries to north and east are less well defined. As such, site guidelines require delivery of a firm development edge to the eastern part of the site to ensure development is suitably contained.
  - b. There are mature trees and hedgerows on site boundaries. As such, site guidelines require a low density development with significant open space and mature trees, hedgerows and priority habitats to be retained as part of the green infrastructure network.
  - c. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool, White Mere, Sweatmere and Crose Mere; and Fenemere. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2.
  - d. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
  - e. The site consists of best and most versatile agricultural land, although this also applies to the majority of the land around Baschurch. This has been appropriately considered within the site assessment.
  - f. Site is in setting of Prescott Conservation Area and may have archaeological potential. As such, site guidelines require development to reflect and respect the sites heritage and heritage assets within the wider area.

**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 BNP035.
- 7.4. With specific regard to flood risk at BNP035, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, the site is not located within any of the surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BNP035. It concluded that the site BNP035 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of BNP035 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 BNP035.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BNP035 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 BNP035 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring delivery of a firm development edge to the eastern part of the site to ensure development is suitably contained.
  - b. Provision of an appropriate highway access and all necessary improvements to the local highway network.
  - c. Providing green infrastructure and open space.
  - d. Retention and enhancement of 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 BNP035. 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 BNP035 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 an Appendix to EV113 the site promoter stated, *"Clearly the site is deliverable immediately and is adjacent to residential development and with safe access."*
- 9.4. A developer associated with the site specified within their Regulation 19 consultation response (reference A0589) that *"Shingler Homes are currently finalising an option on the land with the land owners and wish to develop the site in the short term (2020/21 to 2024/25) The 'Development Guidelines' will be adhered to within the necessary planning application, which will be formulated in discussion with Planning Officers. The site 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 BNP035 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 be undertaken in 2028/29, with all 20 dwellings delivered.
- 10.3. The Council acknowledges these delivery assumptions are more cautious than the developer associated with the site which has specified in their Regulation 19 consultation response (reference A0589) that *"Shingler Homes are currently finalising an option on*

*the land with the land owners and wish to develop the site in the short term (2020/21 to 2024/25) The 'Development Guidelines' will be adhered to within the necessary planning application, which will be formulated in discussion with Planning Officers. The site 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 BNP035 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 BNP035.
- 11.3. The boundary for BNP035 is defined by an agricultural field boundary to the south; an access track beyond which is property curtilages to the west; and the extent of the proposed allocation to the north and east. Site guidelines include a requirement for delivery of a firm development edge to the eastern part of the site to ensure development is suitably contained.

**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 BNP035 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BNP035; 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 BNP035.

- 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 BNP035 – 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 BNP035.
- 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 BNP035, which is a ‘golden thread’ through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process.
- 12.8. The site guidelines will also:
- a. Support the delivery of 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.
- 12.9. Shropshire Council is not aware that representations during the Regulation 19 Pre-Submission Consultation included specific

comments on proposed site guidelines for BNP035. Representations are summarised in SD014.01 and GC4o.

## **Questions: Site Allocation BAY039 – Land off Lyth Hill Road, Bayston Hill**

**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 of Bayston Hill. It primarily consists of two agricultural fields and is bounded by residential curtilages and a watercourse to the north, Lyth Hill Road to the east, mature trees and a property curtilage to the south, and an agricultural field boundary to the west.
- 1.2. To inform the identification of proposed site allocations, including BAY039, 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 Q (SD006.18) 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 Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
  - 1.10. Within Stages 2a and 2b of the site assessment process, around 42 sites were considered at Bayston Hill. Within Stage 3 of the site assessment process, around 11 sites were considered at Bayston Hill.
  - 1.11. BAY039 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 BAY039 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection (summarised in SD014.01 and GC4o) to the site and the assessment process undertaken to identify proposed allocation BAY039. This included:
- a. That the site is crossed by many well-walked public rights of way. Shropshire Council would note that there is no designated public right of way through the site, although one such route does run alongside but beyond the sites western boundary.
  - b. That the site is located to the south of Bayston Hill (associated with Lyth Hill), where the Council's Landscape and Visual Sensitivity Assessment illustrates land is more sensitive than land to the north (within the Green Gap). Shropshire Council considers the conclusions of the Landscape and Visual Sensitivity Study were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.

Shropshire Council is also aware that representations during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) raised objections to the to the site and the assessment process undertaken to identify proposed allocation BAY039. This included:

- a. That the conclusions of Stage 2a of the site assessment process do not support the identification of BAY039 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. The site will result in the loss of high quality agricultural land. Shropshire Council notes that applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to much of the land around Bayston Hill. This has been appropriately considered within the site assessment.
- c. Bayston Hill is constrained by the A49 / development of this site will have an unacceptable highway impact. Shropshire Council considers that through the site assessment process highway matters have been appropriately considered and that this has informed proposed site guidelines.
- d. There is a quarry to the east of Bayston Hill which constrains development at the settlement. Shropshire Council recognises this is a constraint to development to the east of Bayston Hill, but is not considered directly relevant to this site.

- e. Development of the site will have an unacceptable ecological impact (including on Lyth Hill Nature Reserve). Shropshire Council considers that through the site assessment process ecological matters have been appropriately considered and that this has informed proposed site guidelines.
  - f. Loss of light/shading and views from nearby properties and the public footpath. Shropshire Council considers that through the site assessment process visual sensitivity has been appropriately considered and that this has informed proposed site guidelines.
  - g. Flood risk and foul/surface water drainage. Shropshire Council considers that flood risk and foul/surface water drainage have been appropriately considered within the site assessment process, informed by a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA); and Water Cycle Study (EV117.01-EV117.03).
  - h. There is insufficient need for this site and it will result in over-development. Shropshire Council considers that the proposed spatial strategy for the level and distribution of development within the draft Shropshire Local Plan is appropriate.
  - i. The site will have a negative impact of services, facilities and infrastructure. Shropshire Council considers that through the site assessment process capacity of services, facilities and infrastructure has been appropriately considered and that this has informed proposed site guidelines.
- 1.2. In conclusion, Shropshire Council considers that BAY039 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. BAY039 is proposed to be allocated for residential development. This site is some 6.10ha in size and the approximate site provision figure is some 100 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 S16.2(i) of draft Policy S16.2 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 BAY039.
- 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. A Full Planning Application (24/00765/FUL) is currently pending consideration on the entirety of the site for 114 dwellings.

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

**Shropshire Council Response:**

- 5.1. BAY039 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 BAY039 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 Bayston Hill 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. Delivering any necessary highway improvements to the local and strategic road network – including to Lyth Hill Road.
  - b. Delivering a new footpath along the sites eastern frontage and up to Grove Lane.
  - c. Ability to provide green infrastructure and open space – including a buffer to the watercourse along the sites northern boundary and focused around the hedgerow that runs north-south through the site.
  - d. Potential to de-culvert the watercourse along the sites northern boundary.
- 5.5. More generally, it is also considered that development of BAY039 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 BAY039 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 BAY039.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BAY039 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 BAY039 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the

draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:

- a. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic and potentially cumulative recreational impact on Bomere, Shomere and Betton Pools and Berrington Pool Ramsar Sites. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2. These requirements include *"Mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in Bayston Hill and Cross Houses on the Bomere and Shomere Pools Ramsar site..."*
- b. Significant boundary and in-field trees are present plus two hedgerows. Site guidelines require trees and hedgerows on the site will be retained and enhanced. They also require a green infrastructure corridor focusing on the hedgerows through the site.
- c. Watercourse present (culverted in parts). Site guidelines require a green infrastructure corridor focusing on the watercourse through the site. They also require the watercourse to be de-culverted if possible.
- d. Location within the Coal Authority reference area and mineral safeguarding area. This has been appropriately considered within the site assessment.
- e. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to much of the land around Bayston Hill. This has been appropriately considered within the site assessment.
- f. A small component of the site is located within the surface water flood risk zone and a small part of the site is in proximity of an entry on the historic flood map and a 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.
- g. Medium-high/high visual sensitivity. This has been appropriately considered within the site assessment. Furthermore, site guidelines include a requirement for strong and significant natural site boundaries will be provided and green infrastructure corridors.

**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 BAY039.
- 7.4. With specific regard to flood risk at BAY039, in summary:
  - a. With regard to fluvial flood risk, proposed allocation BAY039 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 2% of proposed allocation BAY039 is located within the 1,000 year surface flood risk zone. Around 1% of the site is also located within 20m of an historic flood even and around 12% of the site is located within 20m of a detailed river network.
- 7.5. The proposed site guidelines for BAY039 within Schedule S16.2(i) of draft Policy S16.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage and attenuation ponds, 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."*
- 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 BAY039. It concluded that the site BAY039 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 BAY039 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 BAY039.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BAY039 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 BAY039 within Schedule S16.2(i) of draft Policy S16.2 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 and necessary improvements to the local and strategic road network – including along Lyth Hill Road.
  - b. Providing a footpath along the sites eastern road frontage and continue up to Grove Lane.
  - c. Providing significant natural site boundaries.
  - d. Providing green infrastructure corridors/buffers to the watercourse on the sites northern boundary and the hedgerow that runs through the site.
  - e. Provision of open space.

- f. Potentially de-culverting the watercourse along the sites northern boundary.
  - 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. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of BAY039. 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 BAY039 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).



- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of BAY039 stated *"I can confirm that the draft allocated site is capable of being viably delivered for 100 dwellings, having regard to the policy requirements of the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan."*
- 9.4. The Council would also note that a Full Planning Application (24/00765/FUL) is currently pending consideration on the entirety of the site for 114 dwellings.

**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 BAY039 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 38 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 also note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of BAY039 stated *"I can confirm that the draft allocated site is capable of being viably delivered for 100 dwellings, having regard to the policy requirements of the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan."*
- 10.5. The Council would also note that a Full Planning Application (24/00765/FUL) is currently pending consideration on the entirety of the site for 114 dwellings.

**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 BAY039 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 BAY039.
- 11.3. This boundary for BAY039 consists of residential curtilages and a watercourse to the north, Lyth Hill Road to the east, mature trees and a property curtilage to the south, and an agricultural field boundary to the west.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for BAY039 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BAY039; 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 BAY039.
- 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 BAY039 – 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 BAY039.
- 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 BAY039, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines proposed for BAY039. These are summarised in SD014.01 and GC4o.
- 12.9. The main objection was expressed concern that the proposed approximate site provision figure is too low and the term 'approximate' too uncertain.
- 12.10. Shropshire Council considers the proposed capacity of BAY039 is appropriate and suitable flexibility is provided within draft Policy S16.2 which recognises site provision figures are 'approximate'.

- 12.11. This term is considered appropriate as it provides flexibility to ensure the guideline does not stifle achievement of an appropriate and high-quality designed development.
- 12.12. 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 that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.

### **Questions: Site Allocation BAY050 – Former Oaklands School Site, Bayston Hill**

**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 consists of a part-brownfield site that lies within to the existing built form of Bayston Hill. It consists of the former Oaklands School site and adjacent Glebe Land. The site is bounded by residential curtilages to the north and east; Eric Lock Road West and residential curtilages to the south; and Glebe Road to the west.
- 1.2. To inform the identification of proposed site allocations, including BAY050, 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 Q (SD006.18) 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.

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

- 1.11. Within Stages 2a and 2b of the site assessment process, around 42 sites were considered at Bayston Hill. Within Stage 3 of the site assessment process, around 11 sites were considered at Bayston Hill.
- 1.12. BAY050 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and BAY050 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the site and the assessment process undertaken to identify proposed allocation BAY050.
- 1.15. In conclusion, Shropshire Council considers that BAY050 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. BAY050 is proposed to be allocated for residential development and a significant area of open space. This site is some 3.15ha in size and the approximate site provision figure is some 47 dwellings.
- 2.2. Full Planning Permission (22/02517/FUL) for 23 dwellings has been granted on part of the site and development is ongoing. A significant component of the remainder of the site constitutes open space.
- 2.3. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.4. 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 S16.2(i) of draft Policy S16.2 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 BAY050.
- 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. Full Planning Permission (22/02517/FUL) for 23 dwellings has been granted on part of the site and development is ongoing.
- 4.2. A significant component of the remainder of the site constitutes open space. An Outline Planning Application (23/02061/OUT) was previously submitted and withdrawn on much of this component of the site.

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

**Shropshire Council Response:**

- 5.1. BAY050 is a proposed residential allocation with a significant area of open space. As such, key benefits of the proposed development are the provision of housing and open space 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 BAY050 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 Bayston Hill 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 a significant component of open space that forms the focus for the development – existing open space to be retained or offset unless it is demonstrated to be surplus to requirements.
  - b. Provision of a community hub.
  - c. Provision of appropriate parking for the church and new community hub.
  - d. Ability to enhance pedestrian and cycle links in the settlement.
- 5.5. More generally, it is also considered that development of BAY050 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 BAY050 is provided within the response to Question 1 regarding proposed allocation BAY050.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BAY050 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 BAY050 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic and



potentially cumulative recreational impact on Bomere, Shomere and Betton Pools and Berrington Pool Ramsar Sites. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2. These requirements include *"Mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in Bayston Hill and Cross Houses on the Bomere and Shomere Pools Ramsar site..."*

- b. Potential loss of open space. As such, site guidelines require a significant component of open space that forms the focus for the development and existing open space to be retained or offset, unless it is demonstrated to be surplus to requirements.
- c. Location within the Coal Authority reference area and mineral safeguarding area. This has been appropriately considered within the site assessment.
- d. A small component of the site is located within the surface water flood risk zone and within 20m of a 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.
- e. Applying the precautionary principle, the site technically consists of best and most versatile agricultural land – although it is located within the existing built form of the settlement and is a part-brownfield site. Applying precautionary principle this also applies to the majority of the land around Bayston Hill. This has been appropriately considered within the site assessment.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment

process is provided within the response to Question 1 regarding proposed allocation BAY050.

- 7.4. With specific regard to flood risk at BAY050, in summary:
  - a. With regard to fluvial flood risk, proposed allocation BAY050 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 2% of proposed allocation BAY050 is located within the 100 year surface flood risk zone and around 4% of proposed allocation BAY050 is located within the 1,000 year surface flood risk zone. Around 12% of the site is also located within 20m of a detailed river network.
- 7.5. The proposed site guidelines for BAY050 within Schedule S16.2(i) of draft Policy S16.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BAY050. It concluded that the site BAY050 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 BAY050 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 BAY050.

- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BAY050 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 BAY050 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring a significant component of open space that forms the focus for the development – existing open space to be retained or offset unless it is demonstrated to be surplus to requirements.
  - b. Provision of a community hub.
  - c. Provision of appropriate parking for the church and new community hub.
  - d. Provision of pedestrian and cycle links in the settlement.
  - e. Retention and enhancement of trees and hedgerows on the site.
  - f. 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 BAY050. 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 BAY050 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of BAY050 stated *"With regard to the sites listed below I can confirm that further to the work undertaken to date that they remain very much viable and deliverable with regard to the policy requirements identified within the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan. We will continue to undertake further diligence work in this respect."*
- 9.4. The Council would also note that Full Planning Permission (22/02517/FUL) for 23 dwellings has been granted on part of the site and development is ongoing. A significant component of the remainder of the site constitutes open space.

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

**Shropshire Council Response:**

- 10.1. Full Planning Permission (22/02517/FUL) for 23 dwellings has been granted on part of the site and development is ongoing. A significant component of the remainder of the site constitutes open space.

**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 BAY050 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 BAY050.
- 11.3. The boundary for BAY050 is defined by residential curtilages to the north and east; Eric Lock Road West and residential curtilages to the south; and Glebe Road 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 BAY050 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BAY050; 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 BAY050.
- 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 BAY050 – 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 BAY050.
- 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 BAY050, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the specific site guidelines proposed for BAY050.

## **Questions: Site Allocation BIT022 – Land east of Villa Farm, Bicton**

**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 the village of Bicton. It consists of the entirety of one and the southern component of another agricultural field. It is bounded by property curtilages and the extent of the proposed allocation to the north; property curtilages and an agricultural field boundary to the east, Holyhead Road to the south, Villa Lane to the west.
- 1.2. To inform the identification of proposed site allocations, including BIT022, 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 Q (SD006.18) 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 Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 25 sites were considered at Bicton. Within Stage 3 of the site assessment process, around 13 sites were considered at Bicton.
- 1.11. BIT022 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 BIT022 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).



- 1.13. Shropshire Council is aware that a representation during the Regulation 19 Pre-Submission Consultation included objection to proposed allocation BIT022 on the basis of highway impact.
- 1.14. Shropshire Council considers this proposed allocation was informed by a proportionate and robust site assessment process, which included analysis by Highways Officers. This assessment is unambiguously summarised and conclusions reached explained. This site assessment process fully justifies the identification of BIT022 as a proposed allocation.
- 1.15. In conclusion, Shropshire Council considers that BIT022 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. BIT022 is proposed to be allocated for residential development. This site is some 1.80ha in size and the approximate site provision figure is some 15 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 S16.2(i) of draft Policy S16.2 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 BIT022.
- 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. To date, no planning application has been received on proposed allocation BIT022.

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

**Shropshire Council Response:**

- 5.1. BIT022 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 BIT022 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 Bicton 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. Extension of the 30mph zone for the village and associated traffic calming measures.

- b. Ability to provide green infrastructure/open space and retained existing trees, hedgerows and priority habitats within this provision.
- 5.5. More generally, it is also considered that development of BIT022 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 BIT022 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 BIT022.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BIT022 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 BIT022 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2.
  - b. There is a need to extend the 30mph speed limit and achieve appropriate traffic calming. Site guidelines require extension of the 30mph zone for the village and associated traffic calming measures.
  - c. The site contains mature trees and hedgerows. Site guidelines require existing trees, hedgerows and priority habitats to be retained and enhanced.
  - d. Possible impact on the setting of Grade II\* listed Bicton Grove Farmhouse and the site may have archaeological potential. Site

guidelines require development to respect heritage assets within the wider area.

- e. Noise associated with Holyhead Road (B4380) to the south. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to appropriately manage noise from the B4380.
- f. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- g. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
- h. Applying the precautionary principle, the site consists of best and most versatile agricultural land, although this also applies to all the land around Bicton. This has been appropriately considered within the site assessment.
- i. The site is located within a Grade 3 Source Protection Zone, as is all of Bicton village and the land around it. Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in Source Protection Zones.

**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base 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 BIT022.

- 7.4. With specific regard to flood risk at BIT022, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 4% of the site is located within the 30 year surface flood risk zone; around 5% of the site is located within the 100 year surface flood risk zone; and around 8% of the site is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for BIT022 within Schedule S1.1(i) of draft Policy S16.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BIT022. It concluded that the site BIT022 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 BIT022 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 BIT022.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BIT022 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 BIT022 within Schedule S16.2(i) of draft Policy S16.2 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 from the B4380.
  - b. Providing necessary improvements to the local and strategic road network.
  - c. Extension of the 30mph zone and associated traffic calming measures.
  - d. Providing green infrastructure and open space, incorporating existing trees, hedgerows and priority habitats.
  - 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 BIT022. 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 BIT022 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation BIT022 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 be undertaken in 2031/32, with all 15 dwellings delivered. 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 BIT022 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 BIT022.

- 11.3. The boundary for BIT022 is defined by property curtilages and the extent of the proposed allocation to the north; property curtilages and an agricultural field boundary to the east, Holyhead Road to the south, Villa Lane 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 BIT022 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BIT022; 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 BIT022.
- 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 BIT022 – 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 BIT022.



- 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 BIT022, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities - consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to the approximate site provision figure which forms part of the site guidelines proposed for BIT022. This objection considered the figure was too low.
- 12.9. Shropshire Council considers the proposed capacity is appropriate and is responsive to the sites 'edge of village' location. Furthermore, suitable flexibility is provided within draft Policy S16.2 which recognises site provision figures are 'approximate'.
- 12.10. 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.

## **Questions: Site Allocation BOM019 – Land west of Shrewsbury Road, Bomere Heath – Phase 1**

**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 of the village of Bomere Heath. It consists of the remainder of one agricultural field the rest of which was allocated for development in the adopted Development Plan and has been subject to residential development, and part of a large agricultural field. It is bounded by residential curtilages to the north, Shrewsbury Road to the east, proposed allocation BOM020 to the south, and the extent of the proposed allocation to the west.
- 1.2. Planning Permission (22/05744/FUL) has been granted for 62 dwellings across BOM019 and BOM020. An application to discharge conditions associated with this consent is currently pending consideration.
- 1.3. To inform the identification of proposed site allocations, including BOM019, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or

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

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.9. Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 19 sites were considered at Bomere Heath. Within Stage 3 of the site assessment process, around 8 sites were considered at Bomere Heath.
- 1.12. BOM019 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.

- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and BOM019 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to the site assessment process and proposed allocation BOM019. These objections are summarised in SD014.01 and GC4o.
- 1.15. They included the view that alternative sites constitute poorer agricultural land quality and as such should be allocated instead. Shropshire Council considers that a proportionate and robust site assessment process has been undertaken, which included consideration of agricultural land quality. This assessment and conclusions reached are unambiguously summarised and the assessment process fully justifies the identification of BOM019 as a proposed allocation.
- 1.16. In conclusion, Shropshire Council considers that BOM019 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. BOM019 is proposed to be allocated for residential development. This site is some 1.98ha in size and the approximate site provision figure is some 40 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 S16.2(i) of draft Policy S16.2 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 BOM019.
- 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.
- 4.2. Planning Permission (22/05744/FUL) has now been granted for 62 dwellings across BOM019 and BOM020. An application to discharge conditions associated with this consent is currently pending consideration.

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

**Shropshire Council Response:**

- 5.1. BOM019 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 BOM019 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 Bomere Heath 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. Extension of the 30mph speed limit for the village.
  - b. A new/enhanced pedestrian footpath from the site to the services in the village. This will support pedestrian access to the sports pitch to the south of the site.
  - c. Ability to provide green infrastructure and open space – including existing trees, hedgerows, public rights of way and priority habitats on the site.
- 5.5. More generally, it is also considered that development of BOM019 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 BOM019 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 BOM019.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BOM019 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 BOM019 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There is a need to extend the 30mph speed limit and achieve appropriate traffic calming. Site guidelines require extension of the 30mph zone for the village and associated traffic calming measures.
  - b. A public right of way crosses the site. Site guidelines require this public right of way to be retained and enhanced.
  - c. The site contains mature trees and hedgerows. Site guidelines require existing trees, hedgerows and priority habitats to be retained and enhanced.
  - d. Applying the precautionary principle, the site consists of best and most versatile agricultural land, although this also applies to much of the land around Bomere Heath. This has been appropriately considered within the site assessment.
  - e. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
  - f. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
  - g. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2.
  - h. Noise associated with Shrewsbury Road to the east. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to appropriately manage noise from the B4380.

**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 BOM019.
- 7.4. With specific regard to flood risk at BOM019, 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 8% of the proposed allocation is within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for BOM019 within Schedule S1.1(i) of draft Policy S1.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BOM019. It concluded that the site BOM019 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 BOM019 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 BOM019.

- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BOM019 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 BOM019 within Schedule S16.2(i) of draft Policy S16.2 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 local and strategic road network, including extension of the 30mph speed limit for the village.
  - c. Formation of a new/enhanced pedestrian footpath from the site to the services in the village. This will support pedestrian access to the sports pitch to the south of the site.
  - d. Retention and enhancement of existing trees, hedgerows, public rights of way and priority habitats on the site and provision of open space and green infrastructure.
  - 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 BOM019. 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 BOM019 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 an Appendix of EV113 the promoter of BOM019 states *"We can confirm that the site is viable and that it is deliverable."*
- 9.4. Furthermore, the Council would also note that Planning Permission (22/05744/FUL) has been granted for 62 dwellings across BOM019 and BOM020. An application to discharge conditions associated with this consent is currently pending consideration.

**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 BOM019 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 2027/28 and continue until 2028/29. The Council also anticipates that development will progress at a rate of 20 dwellings per annum, responsive to the site size and standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council acknowledges that as the site now benefits from Planning Permission (22/05744/FUL) these assumptions are likely to be overly conservative.

**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 BOM19 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 BOM019.
- 11.3. The boundary for BOM019 is defined by residential curtilages to the north, Shrewsbury Road to the east, proposed allocation BOM020 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 BOM019 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BOM019; 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 BOM019.

- 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 BOM019 – 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 BOM019.
- 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 BOM019, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

- 12.8. Shropshire Council is aware that representation during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines proposed for BOM019. These are summarised in SD014.01 and GC4o. Dealing with the main objections in turn:
- a. Vehicular access off Shrewsbury Road is unnecessary, this can be achieved off the recently constructed roundabout access on Shrewsbury Road that serves the site to the north. Shropshire Council considers this proposed site guideline is appropriate in that it requires appropriate access to Shrewsbury Road, but this does not need to constitute a new access.
  - b. Requirements for pedestrian links between the site and village would duplicate existing provision and are unnecessary. Shropshire Council considers that pedestrian links through the site need to be retained and enhanced (or alternative provided) and as such the proposed guideline is appropriate.
  - c. The site is in proximity of a sports pitch used for cricket. As such site guidelines need to require an appropriate ball strike assessment and undertake any required mitigation. Shropshire Council supports this principle and an appropriate main modification is proposed within GC4m.
  - d. Sustainable drainage provided to support development to the north of the site can also accommodate BOM019 and BOM020. Shropshire Council notes that site guidelines require a sustainable drainage strategy to inform appropriate sustainable drainage of the site. This can of course include consideration of existing capacity within the sustainable drainage provided previously.

**Questions: Site Allocation BOM020 – Land west of Shrewsbury Road, Bomere Heath – Phase 2**

**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 of the village of Bomere Heath. It consists of part of a large agricultural field. It is bounded by proposed allocation BOM019 to the north, Shrewsbury Road to the east, the boundary to a sports pitch to the south, and the extent of the proposed allocation to the west.
- 1.2. Planning Permission (22/05744/FUL) has been granted for 62 dwellings across BOM019 and BOM020. An application to discharge conditions associated with this consent is currently pending consideration.

- 1.3. To inform the identification of proposed site allocations, including BOM020, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.

- 1.9. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 19 sites were considered at Bomere Heath. Within Stage 3 of the site assessment process, around 8 sites were considered at Bomere Heath.
- 1.12. BOM020 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and BOM020 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to the site assessment process and proposed allocation BOM020. These objections are summarised in SD014.01 and GC4o.
- 1.15. They included the view that alternative sites constitute poorer agricultural land quality and as such should be allocated instead. Shropshire Council considers that a proportionate and robust site assessment process has been undertaken, which included consideration of agricultural land quality. This assessment and conclusions reached are unambiguously summarised and the

assessment process fully justifies the identification of BOM020 as a proposed allocation.

- 1.16. In conclusion, Shropshire Council considers that BOM020 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. BOM020 is proposed to be allocated for residential development. This site is some 0.90ha in size and the approximate site provision figure is some 15 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 S16.2(i) of draft Policy S16.2 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 BOM020.
- 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.
- 4.2. Planning Permission (22/05744/FUL) has now been granted for 62 dwellings across BOM019 and BOM020. An application to discharge conditions associated with this consent is currently pending consideration.

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

**Shropshire Council Response:**

- 5.1. BOM020 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 BOM020 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 Bomere Heath 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. Extension of the 30mph speed limit for the village.
  - b. A new/enhanced pedestrian footpath from the site to the services in the village. This will support pedestrian access to the sports pitch to the south of the site.
  - c. Ability to provide green infrastructure and open space – including existing trees, hedgerows, public rights of way and priority habitats on the site.

- 5.5. More generally, it is also considered that development of BOM020 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 BOM020 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 BOM020.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BOM020 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 BOM020 within Schedule S16.2(i) of draft Policy S16.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There is a need to extend the 30mph speed limit and achieve appropriate traffic calming. Site guidelines require extension of the 30mph zone for the village and associated traffic calming measures.
  - b. The site contains mature trees and hedgerows. Site guidelines require existing trees, hedgerows and priority habitats to be retained and enhanced.
  - c. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
  - d. Applying the precautionary principle, the site consists of best and most versatile agricultural land, although this also applies to much of the land around Bomere Heath. This has been appropriately considered within the site assessment.
  - e. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.

- f. Habitats Regulations Assessment (HRA) was required to assess nitrogen oxide pollution from increased road traffic (in combination) on Hencott Pool. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S16.2.
- g. Noise associated with Shrewsbury Road to the east. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to appropriately manage noise from the B4380.

**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 BOM020.
- 7.4. With specific regard to flood risk at BOM020, 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 30 year surface flood risk zone; around 5% within the 100 year surface flood risk zone; and around 11% within the 1,000 year surface flood risk zone. 44% of the site is also within 20m of an historic flood event.
- 7.5. The proposed site guidelines for BOM020 within Schedule S1.1(i) of draft Policy S1.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be*

*managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.”*

- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BOM020. It concluded that the site BOM020 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 BOM020 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 BOM020.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BOM020 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 BOM020 within Schedule S16.2(i) of draft Policy S16.2 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 local and strategic road network, including extension of the 30mph speed limit for the village.
  - c. Formation of a new/enhanced pedestrian footpath from the site to the services in the village. This will support pedestrian access to the sports pitch to the south of the site.
  - d. Retention and enhancement of existing trees, hedgerows, public rights of way and priority habitats on the site and provision of open space and green infrastructure.
  - 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 BOM020. 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 BOM020 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 an Appendix of EV113 the promoter of BOM020 states "*We can confirm that the site is viable and that it is deliverable.*"
- 9.4. Furthermore, the Council would also note that Planning Permission (22/05744/FUL) has been granted for 62 dwellings across BOM019 and BOM020. An application to discharge conditions associated with this consent is currently pending consideration.

**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 BOM020 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that the entirety of the development will occur in 2029/30. However, Shropshire Council acknowledges that as the site now benefits from Planning Permission (22/05744/FUL) these assumptions are likely to be overly conservative.

**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 BOM20 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 BOM020.

- 11.3. The boundary for BOM020 is defined by proposed allocation BOM019 to the north, Shrewsbury Road to the east, the boundary to a sports pitch 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 BOM020 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of BOM020; 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 BOM020.
- 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 BOM020 – 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 BOM020.

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 BOM020, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:

- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
- c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
- d. Promote healthy and safe communities - consistent with paragraphs 92-93 of the NPPF.
- e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
- f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

12.8. Shropshire Council is aware that representation during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines proposed for BOM020. These are summarised in SD014.01 and GC4o. Dealing with the main objections in turn:

- a. Vehicular access off Shrewsbury Road is unnecessary, this can be achieved off the recently constructed roundabout access on Shrewsbury Road that serves the site to the north. Shropshire Council considers this proposed site guideline is appropriate in that it requires appropriate access to Shrewsbury Road, but this does not need to constitute a new access.
- b. Requirements for pedestrian links between the site and village would duplicate existing provision and are unnecessary. Shropshire Council considers that pedestrian links through the site need to be retained and enhanced (or alternative provided) and as such the proposed guideline is appropriate.
- c. The site is in proximity of a sports pitch used for cricket. As such site guidelines need to require an appropriate ball strike assessment and undertake any required mitigation. Shropshire Council supports this principle and an appropriate main modification is proposed within GC4m.



- d. Sustainable drainage provided to support development to the north of the site can also accommodate BOM019 and BOM020. Shropshire Council notes that site guidelines require a sustainable drainage strategy to inform appropriate sustainable drainage of the site. This can of course include consideration of existing capacity within the sustainable drainage provided previously.

### **Questions: Site Allocation FRD011 – Land adjoining But Lane on A458, Ford**

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

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

- 1.1 The proposed allocation FRD011 lies to the east of Ford village on open land adjoining the A458 which runs along the southern boundary of the site. FRD011 consists of one large agricultural field bounded to the west by But Lane, which is principal highway access into the village from the A458. To the north, FRD011 adjoins the boundary of the existing residential development of Quail Ridge and an agricultural field boundary to the east.
- 1.2 To inform the identification of proposed site allocations, including FRD011, 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 Q (SD006.18) 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 Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10 Within Stages 2a and 2b of the site assessment process, around 14 sites were considered at Ford. Within Stage 3 of the site assessment process, around 7 sites were considered at Ford.

- 1.11 FRD011 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 FRD011 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection (summarised in SD014.01 and GC4o) to the site and the assessment process undertaken to identify proposed allocation FRD011. This included:
- a. Site development guidelines welcomed but further detailed investigations, an appropriate development scheme and specific infrastructure investments should address the sites' heritage value and hydrogeological setting over a source protection zone for a public water supply. Shropshire Council would note that no evidence was provided that FRD011 was within a Source Protection Zone and might impact on a public water supply.
  - b. Developers should deliver essential infrastructure before any development is permitted in Ford.
- Shropshire Council considered the representations received during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52). There were no objections to the proposed allocation of FRD011.
- 1.14 In conclusion, Shropshire Council considers that FRD011 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. FRD011 is proposed to be allocated for residential development. This site comprises 4.05ha of greenfield land adjoining the south-eastern edge of Ford which is designated as a Community Hub. The approximate site provision figure is for 125 dwellings.
- 2.2. Detailed development guidelines within Schedule S16.2(i) of draft Policy S16.2 and the wider policies in the draft Shropshire Local Plan

provide the policy framework for the development of this allocated housing 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.
- 2.4. The development guidelines indicate the site is proposed to be developed in its entirety and will deliver a lower density development to satisfy the settlement housing guideline and provide infrastructure improvements to the benefit of the local community.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S16.2(i) of draft Policy S16.2 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 of FRD011.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

- 4.1. This site is currently the subject of discussions between the Council and the site promoter about specific details for the development with a view to submitting an application on the adoption of the Local Plan.

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

**Shropshire Council Response:**

- 5.1 FRD011 is a proposed residential allocation comprising 4.05 hectares which is proposed for 75 dwellings. The site area exceeds the proposed capacity because the land does not readily divide into two separate sites and it is proposed to develop the entire site at a lower density and a lower capacity. This is expected to be reflected in the range of types and sizes of dwellings, the layout of the proposed scheme and the provision of green infrastructure through and around the site.
- 5.2 As such, key benefits of the proposed development include:
- a. The provision of housing to contribute to meeting the needs of all groups within the village other communities in the Place Plan area.
  - b. Highway improvements to the A458 junction serving the principal highway access into Ford and a gateway feature around the site access on But Lane.
  - c. Removal of existing traffic calming measures around the school on But Lane and replacement with parking provision for the school with dropping off point within FRD011.
  - d. entrance Supporting the housing needs of the Black Country, through the accommodation of part of the proposed contribution to the unmet housing needs forecast to arise in the Black Country.
  - e. Protection of existing mature trees and hedgerows particularly around the new site access on But Lane with compensatory planting to replace any loss of existing tree or hedgerow cover.
  - f. Landscaping to enclose the development from Quail Ridge and adjacent countryside (east) to protect the amenity of existing and new residents.
- 5.3 Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Ford and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of FRD011 and the wider draft policies in the draft Shropshire Local Plan.
- 5.4 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines.

5.5 These include:

- a. Ensuring the comprehensive development of the entire site to encompass a large open field along the A458 frontage into the built development within Ford village.
- b. The provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Shrewsbury Place Plan area.
- c. Site capacity, design, layout, dwelling types, sizes and orientation, acoustic design/materials and green infrastructure to visually enclose the southern edge of the village from the A458 and to mitigate for traffic noise from the A458.
- d. Comprehensive highway improvements comprising:
  - i. Increasing the capacity of the A458 ghost island right turning lane.
  - ii. creating a suitable access on But Lane as a gateway feature to the village.
  - iii. positioning the site access to the north end of the site boundary to But Lane (on the west of the site) to avoid conflict with traffic movements from the school and along But Lane and into/from the A458 junction.
  - iv. removing the existing traffic calming measures around the school and replacing this with school parking and a dropping off point located within FRD011.
  - v. extend pedestrian and cycling links from the existing networks to include the existing footpath (PROW) through FRD011 linking the A458 to the existing Quail Ridge housing development adjoining FRD011.
  - vi. Improving the pedestrian access across the A458 to the commercial services on the south side of the village to the benefit of the community.
- e. Protect existing mature trees and hedgerows particularly around the new highway access on But Lane with compensatory planting to replace any removal of the existing.
- f. Landscaping to enclose the development from Quail Ridge and adjacent countryside (east) to protect the amenity of existing and new residents.
- g. Traffic volume increases may require a Habitats Regulations Assessment of impacts on the distant Hencott Pool Ramsar site.

5.6 More generally, it is also considered that development of FRD011 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire. It will also support the ability of the Black Country to meet their housing needs.

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

**Shropshire Council Response:**

- 6.1 Potential adverse impacts of developing FRD011 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 FRD011.
- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that FRD011 constituted an appropriate proposed mixed-use allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3 The draft site guidelines for FRD011 within Schedule S16.1(i) of draft Policy S16.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Site lies along But Lane which forms the western boundary to the site. But Lane is the principal highway access into Ford village from the A458, a strategic corridor through the County and serving Shrewsbury. But Lane also serves the Primary School located in the village. The site guidelines require comprehensive highway improvements including:
    - i. Increasing the capacity of the A458 ghost island right turning lane.
    - ii. creating a suitable access on But Lane as a gateway feature to the village.
    - iii. positioning the site access to the north end of the site boundary to But Lane (on the west of the site) to avoid conflict with traffic movements from the school and along But Lane and into/from the A458 junction.
    - iv. removing the existing traffic calming measures around the school and replacing this with school parking and a dropping off point located within FRD011.
    - v. extend pedestrian and cycling links from the existing networks to include the existing footpath (PROW) through FRD011 linking the A458 to the existing Quail Ridge housing development adjoining FRD011.

- vi. Improving the pedestrian access across the A458 to the commercial services on the south side of the village to the benefit of the community.
- b. Location close to the A458 may increase traffic volumes on this strategic highway with significant increases in road emissions within the impact risk zone for Hencott Pool Ramsar Site. Site guidelines may require a Habitats Regulations Assessment of impacts on the distant Hencott Pool Ramsar site... Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- c. Site has medium landscape and visual sensitivity in the local landscape and from views obtained from the adjoining A458.
- d. Presence of mature trees and hedgerows on-site. Site guidelines therefore require mature trees, hedgerows, structural vegetation and green infrastructure corridors to be retained and enhanced.
- e. The scale of this open site indicates there may be archaeological interest which should be investigated and any further assessments undertaken where indicated by desktop survey. Site guidelines require relevant supporting studies should be undertaken particularly heritage assessment with particular focus on potential archaeology and recommendations reflected in the development scheme.
- f. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
- g. Applying the precautionary principle, the site consists of best and most versatile agricultural land. This has been appropriately considered within the site assessment.
- h. The site lies within Flood Zone 1 with no known surface water flooding risk but this large, relatively flat site may be prone to some localised surface water flooding or ingress from surrounding urban or countryside sites. Site guidelines require relevant supporting studies should be undertaken particularly surface water flood risk and drainage, along with ecology, tree and hedgerow surveys and recommendations reflected in the development scheme.
- i. Noise associated with the adjoining A458 and existing / proposed employment areas. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage any noise arising from these and other sources.



**Question 7.** *How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?*

**Shropshire Council Response:**

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation FRD011 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at FRD011 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across the site.
- 7.5. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation FRD011 passed the sequential test and the exception test was not required.
- 7.6. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for FRD011 within Schedule S16.2(i) of Draft Policy S16.2 address this issue, stating *"Relevant supporting studies should be undertaken particularly transport assessments, heritage assessment with particular focus on potential archaeology, ecology, tree and hedgerow surveys, surface water flood risk and drainage. Recommendations to be clearly reflected in the development scheme."*

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of FRD011 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 FRD011.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that FRD011 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 FRD011 within Schedule S16.2(i) of draft Policy S16.2 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 and necessary improvements to the local and strategic road network including the A458 with improvements to the ghost island right turning lane and pedestrian crossing point to services in the south of the village.
  - b. Providing contemporary traffic management measures along But Lane along with an appropriate site access.
  - c. Providing parking and dropping off space within the boundary of FRD011 for the adjacent Primary School on But Lane.
  - d. Providing a green infrastructure scheme with significant natural site boundaries to enclose FRD011 in the built form of the village and to enclose FRD011 from views and impacts from the A458. Providing structure landscaping and compensatory planting for removal of mature trees or hedgerows.
  - e. Provision of open space.

- f. 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 FRD011. 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 FRD011 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of FRD011 stated “*The site is*

*viable and deliverable but the timescale is likely to be short term rather than medium term."*

**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 FRD011 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2029/30. Shropshire Council considers this expected timescale is realistic and deliverable but on the adoption of the Plan, FRD011 is likely to be completed early in the period from 2025/26.
- 10.3. Shropshire Council would also note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of FRD011 stated "*The site is viable and deliverable but the timescale is likely to be short term rather than medium term.*"

**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 FRD011 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 FRD011.
- 11.3. This boundary for FRD011 consists of the A458 and But Lane to the south and west, the existing housing development of Quail Ridge to the north and an agricultural field boundary to the east.

**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 FRD011 within Schedule S16.2(i) of draft Policy S16.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of FRD011; 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 FRD011.
- 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 FRD011 – 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 FRD011.
- 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 FRD011, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

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

12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines. These are summarised in SD014.01 and GC4o but there were no objections to FRD011 in response to this consultation.

12.9 Shropshire Council considers the proposed capacity of FRD011 is appropriate and suitably flexibility given the intended lower density of development ton this relatively large site. The capacity of 75 dwellings us identified within draft Policy S16.2 which recognises site provision figures are 'approximate'.

12.10 This term is considered appropriate as it provides flexibility to ensure the guideline does not stifle achievement of an appropriate and high-quality designed development.

12.11 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 that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.