

Shropshire Local Plan Examination

Shropshire Council Response to:

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

Matter 21



**Matter 21 - Shifnal Place Plan Area (policy S15) – see
MMs 105-109**

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 Shifnal Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Shifnal Place Plan area is established within draft settlement policies S15.1-S15.4, 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. In addition, the draft settlement policies are responsive to the characteristics, constraints, and opportunities of Shifnal as the only location for development in the Place Plan area. This recognises the role and function of Shifnal in supporting those other communities located in the Shropshire Green Belt.
- 1.4. In positively responding to the characteristics, constraints and opportunities in the Shifnal Place Plan area, the draft Shropshire Local Plan identifies the role and function of Shifnal as the location to accommodate development specifically as:
 - a. Shifnal is proposed to be identified as a Key Centre where growth will respond to need in the town and its surrounding hinterland where development is constrained by national policies on inappropriate development. Shifnal also contributes towards achieving strategic growth objectives in the east of the County, consistent with the requirements of Policy S15.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Shifnal envisage the delivery of around 1,500 dwellings between 2016 and 2038 and around 41ha of employment land will be made available for employment development to create choice and competition in the market

between 2016 and 2038. It is proposed that Shifnal should accommodate 30ha of this employment land guideline figure to contribute towards the unmet employment and need forecast to arise in the Black Country.

- b. It is proposed that no Community Hubs be identified in the Shifnal Place Plan Area which recognises that other settlements in the Shifnal Place Plan Area are designated as 'washed over' settlements in the Green Belt and subject to the requirements of national policy on inappropriate development.
 - c. It is proposed that no Community Clusters be identified in the Shifnal Place Plan Area which recognises that other settlements in the Shifnal Place Plan Area are designated as 'washed over' settlements in the Green Belt and subject to the requirements of national policy on inappropriate development.
- 1.5. A Neighbourhood Plan area was adopted in 2016 for Shifnal for the period 2014 – 2026. This Neighbourhood Plan remains in general conformity with the draft Local Plan but may need to be reviewed to support the implementation of the strategy for Shifnal and the wider Shropshire Local Plan.
- 1.6. In identifying site allocations to contribute to the achievement of the strategy proposed for Shifnal, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options in Shifnal and the adjoining Green Belt parcels identified in the Shropshire Green Belt Assessment (EV049.01) and Green Belt review (EV050.01) including Appendix 7 Shifnal (EV050.08).
- 1.7. Through this process four proposed allocations are identified at Shifnal comprising three housing allocations and one employment land allocation. The most recent iteration of this assessment work for Shifnal is summarised within the updated Additional Sustainability Appraisal Report in Appendix 8 Shifnal (GC44). The proposed site allocations are:
- a. SHF013 which constitutes a proposed residential allocation for 65 dwellings at Meadow Drive on previously safeguarded land in the north of the town.
 - b. SHF015 & SHF0129 constitutes a proposed residential allocation for 65 dwellings between the A464 Wolverhampton Road and Park Lane on previously safeguarded land in the south of the town.
 - c. SHF022 & SHF023 (part) which constitutes a proposed residential allocation for 100 dwellings between the A464 Wolverhampton Road and the wooded area of Revells Rough on previously safeguarded land in the east of the town.

- d. SHF018b & SHF018d which constitutes a proposed employment land allocation for 39 hectares located around Upton Lane and extending the existing Shifnal industrial Estate on Green Belt land located to the east of the town.
- 1.8. Furthermore, through this site assessment process, six proposed areas of safeguarded land were identified at Shifnal to ensure the long term sustainability of the town. These areas are:
- a. Land adjoining the junction of Stanton Road and Lamledge Lane which comprises 4.5 hectares which are proposed to be removed from the Green Belt and safeguarded for future development beyond 2038.
 - b. Land adjoining Shifnal Hillcrest School and Shifnal Industrial Estate which comprises 9.4 hectares which are proposed to be removed from the Green Belt and safeguarded for future development beyond 2038.
 - c. Land between A464 (south) and Park Lane which comprises 9.6 hectares which are proposed to be removed from the Green Belt and safeguarded for future development beyond 2038.
 - d. Land between Park Lane and A4169 at Lodge Hill which comprises 46.1 hectares which are proposed to be removed from the Green Belt and safeguarded for future development beyond 2038.
 - e. Land between A4169 and the western rail line which comprises 12.8 hectares which are proposed to be removed from the Green Belt and safeguarded for future development beyond 2038.
 - f. Land between Revells Rough, Lamledge Lane and the eastern rail line which comprises 10.4 hectares which will continue to be safeguarded from a previous Local Plan for future development beyond 2038.
- 1.9. It is proposed that five of these areas of safeguarded land would be removed from the Green Belt and safeguarded along with one further area of land already safeguarded from a previous Local Plan for future development beyond the proposed plan period.
- 1.10. The Shifnal 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, Shifnal was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.11. A robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options within the identified assessment geography – including Shifnal. Through this process, SHF018b & SHF018d were identified as an appropriate location to accommodate part of the proposed

contribution to the Black Country. Specifically, it is proposed that SHF018b & SHF018d accommodate the proposed contribution of 30 hectare of employment land towards unmet needs in the Black Country. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.

- 1.12. Shropshire Council considers that development proposals in the Shifnal 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.
- 1.13. Through the accommodation of part of the proposed contribution to the unmet employment land need forecast to arise in the Black Country, they will also support the ability of the Black Country Authorities to meet their employment needs.
- 1.14. The Council considers the proposed approach to development in the Shifnal Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
- 1.15. 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).
- 1.16. The Council considers the proposed approach to development in the Shifnal Place Plan area is effective as it includes a clear strategy and detailed criteria to manage development in this locality within the Shropshire green Belt. This ensures a shared understanding amongst communities, developers and decision makers. As such, it is considered implementable and deliverable over the proposed plan period.
- 1.17. The Council considers the proposed approach to development in the Shifnal 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 SHF013 – Land adjoining Meadow Drive, Shifnal

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 residential allocation SHF013 comprises 2.6 hectares which is proposed for 65 dwellings. The site adjoins Meadow Drive on its western and southern boundaries, the embankment of the elevated M54 to the north, and open land extending to the residential curtilages of properties on the distant Coppice Green Lane to the east.
- 1.2. The site is located within an existing residential area and its current status as the last area of safeguarded land in the north of Shifnal would promote the development of the site for housing use. The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the town.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 8 of the additional Sustainability

Appraisal (GC44). A more detailed summary of the assessment of development options in Shifnal is summarised within SD006.17.

- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process was a screening exercise which considered the availability; size and strategic suitability of the site. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where uncertainty remained about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints were considered to show the site was unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.

- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shifnal Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of the planning application register, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 38 sites were considered at Shifnal. Within Stage 3 of the site assessment process, around 29 sites were considered at Shifnal.
- 1.11. SHF013 was proactively promoted for residential development during the plan-making process and ultimately identified as a proposed residential 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 SHF013 was identified as a proposed residential allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of SHF013 as a proposed allocation. These objections are summarised in SD014.01 and GC4o.
- 1.14. They included a single objection that required the site capacity be increased from 65 dwellings to 116 dwellings [along with a site capacity increase for SHF022 & SHF023] to permit the removal of proposed allocation SHF015 & SHF029 from the Plan. Shropshire Council considers the site assessment process gave appropriate consideration to constraints and opportunities on the site and appropriately informed its proposed capacity. Shropshire Council also considers that an appropriate and deliverable development strategy is proposed for Shifnal.
- 1.15. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation included support and objection to the site assessment process which identified SHF013 as an appropriate location for housing development. These responses are summarised in GC52. There were no further objections to SHF013 in response to this additional consultation.
- 1.16. In conclusion, Shropshire Council considers that SHF013 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 8 of GC44.

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

Shropshire Council Response:

- 2.1. SHF013 is proposed to be allocated for residential development. This site comprises 2.6ha of greenfield land forming an 'infilling' site abutting up to the embankment of the M54. SHF013 is on the northern edge of Shifnal which is designated as a Key Centre and the approximate site provision figure is for 65 dwellings.
- 2.2. Detailed development guidelines within Schedule S15.1(i) of draft Policy S15.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated 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 would be expected to provide a broad range of housing with dwelling types and sizes to help meet local housing needs with potential for lower cost housing, age specific housing and policy compliant affordable housing.

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 S15.1(i) of draft Policy S15.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of SHF013.
- 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. This site has a previous planning history but no previous proposals identified a suitable scheme for the site which largely considered affordable housing schemes.

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

Shropshire Council Response:

- 5.1 The proposed residential allocation SHF013 comprises 2.6 hectares which is proposed for 65 dwellings. The site adjoins Meadow Drive on its western and southern boundaries, the embankment of the elevated M54 to the north, and open land extending to the residential curtilages of properties on the distant Coppice Green Lane to the east.
- 5.2 The site is located within an existing residential area and its current status as the last area of safeguarded land in the north of Shifnal would promote the development of the site for housing use. The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.3 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.
 - b. The use of existing safeguarded land previously removed from the Green Belt for development which avoids the need to release further Green Belt land to meet housing needs in Shifnal.
 - c. Site is located in an area which has recently accommodated residential development and SHF013 will make sustainable use of recent physical infrastructure investments in north Shifnal.
- 5.4 Furthermore, Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Shifnal and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of SHF013 and the wider draft policies in the draft Shropshire Local Plan.

- 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. Site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs with potential for lower cost housing, age specific housing and policy compliant affordable housing.
 - b. Site is not within an Air Quality Management Area but consideration to be given to mitigating any impact from emissions from M54 to the north of the site.
 - c. Dwelling design should consider enhancement of façade with glazing solutions, ventilation measures and internal layout of living spaces to mitigate for noise impacts.
 - d. A noise assessment should inform the design of the scheme in relation to the layout/landscaping of the development and the design of the dwellings in the north, and possibly extending through, the site.
 - e. Layout and landscaping should consider stand-off from northern boundary, orientation of dwellings with possible acoustic fencing and additional tree and hedgerow planting.
 - f. Landscaping and open space within the proposed development to enhance the Green Infrastructure network, particularly the woodland with mature protected trees and open land, to the west, north and east of the site boundaries.
 - g. Landscaping and open space to protect trees and hedgerows, allow foraging/passage of species through the site and use of habitat on site margins.
 - h. Open space with consideration of equipped play space to be located on site with part provision on the eastern boundary to mirror the adjacent development on Coppice Green Lane.
 - i. Highway access will be from the existing spur road off Meadow Drive to form an access junction with the western boundary of this largely enclosed site.
 - j. Consideration to be given to the creation of a new footpath to link into existing network between Meadow Drive and adjacent development on Coppice Green Lane to improve permeability of north-east of town.
 - k. Site will incorporate appropriate sustainable drainage, informed by sustainable drainage strategy focusing on central north-south ditch through the site.
 - l. Any residual surface water flood risk to be managed by excluding built development from the affected areas of the site

and providing a SuDS to form part of the Green Infrastructure network.

- 5.6 More generally, it is also considered that development of SHF013 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 SHF013 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 SHF013.
- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF013 constituted an appropriate 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 SHF013 within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Site is located adjacent on the M54 corridor where air quality will be impacted by emissions from vehicles on the M54. Site guidelines recognise that SHF013 is not within an Air Quality Management Area but consideration should be given to mitigating any impact from emissions from M54 to the north of the site with the layout and landscaping considering a stand-off from northern boundary, orientation of dwellings with possible acoustic fencing and additional tree and hedgerow planting.
 - b. Medium-high visual sensitivity. This has been appropriately considered within the site assessment and the site guidelines require landscaping and open space within the proposed development to enhance the Green Infrastructure network,

particularly the woodland with mature protected trees and open land, to the west, north and east of the site boundaries.

- c. Site capacity should be reduced to retain existing woodland to west and north which contains a Tree Protection Order which should be protected and buffered to maintain an existing corridor within the environmental network. Site guidelines require Landscaping and open space to protect trees and hedgerows, allow foraging/passage of species through the site and use of habitat on site margins with additional tree and hedgerow planting.
- d. The scale of the site requires investigation of archaeological interest. Site guidelines require relevant supporting studies to be undertaken including heritage and archaeology with recommendations reflected in proposed development.
- e. A small area of the central part of the site is in the surface water flood risk zones, and the site lies over a Source Protection Zone. Site guidelines require Site will incorporate appropriate sustainable drainage, informed by sustainable drainage strategy focusing on central north-south ditch through the site. Any residual surface water flood risk to be managed by excluding built development from the affected areas of the site and providing a SuDS to form part of the Green Infrastructure network.
- f. Noise associated with the adjacent M54 requires further assessment of air quality and mitigation for road noise which may require site capacity to be reduced along northern boundary. Site guidelines require A noise assessment should inform the design of the scheme in relation to the layout/landscaping of the development and the design of the dwellings in the north, and possibly extending through, the site.
- g. Location within the Coal Authority reference area and 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. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment

(EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.

- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation SHF013 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at SHF013 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. The flood risk also recognises:
 - a. Around 9% of SHF013 lies within the 30 and 100 year surface flood risk zones.
 - b. Around 12% of SHF013 lies within the 1,000 year surface flood risk zone which would limit development to 88% of the site area.
- 7.5. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths in the centre of the site. These measures would manage surface water flood risks during severe conditions.
- 7.6. The proposed site guidelines for SHF013 within Schedule S15.1(i) of draft Policy S15.1 address this issue, stating *"Site will incorporate appropriate sustainable drainage, informed by sustainable drainage strategy focusing on central north-south ditch through the site. Any residual surface water flood risk to be managed by excluding built development from the affected areas of the site and providing a SuDS to form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation SHF013 passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for SHF013 address this

issue, stating "Relevant supporting studies to be undertaken of traffic assessments, heritage including archaeology, detailed ecological assessment, tree survey particularly mature woodland on western boundary surface water flood risk on site and drainage on Newport Road, noise and air quality assessments with recommendations reflected in proposed development."

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 SHF013 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 SHF013.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF013 constituted an appropriate proposed residential allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for SHF013 within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5 The site guidelines include:
 - a. Layout and landscaping should consider stand-off from northern boundary, orientation of dwellings with possible acoustic fencing and additional tree and hedgerow planting.
 - b. Landscaping and open space within the proposed development to enhance the Green Infrastructure network, particularly the woodland with mature protected trees and open land, to the west, north and east of the site boundaries.

- c. Landscaping and open space to protect trees and hedgerows, allow foraging/passage of species through the site and use of habitat on site margins.
 - d. Open space with consideration of equipped play space to be located on site with part provision on the eastern boundary to mirror the adjacent development on Coppice Green Lane.
 - e. Highway access will be from the existing spur road off Meadow Drive to form an access junction with the western boundary of this largely enclosed site.
 - f. Consideration to be given to off-site highway works at junction of Newport Road/Meadow Drive/Haughton Road to provide satisfactory highway capacity and highway drainage improvements to address existing surface water flooding constraints.
 - g. Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - h. Consideration to be given to the creation of a new footpath to link into existing network between Meadow Drive and adjacent development on Coppice Green Lane to improve permeability of north-east of town.
 - i. Site will incorporate appropriate sustainable drainage, informed by sustainable drainage strategy focusing on central north-south ditch through the site.
 - j. Any residual surface water flood risk to be managed by excluding built development from the affected areas of the site and providing a SuDS to form part of the Green Infrastructure network.
- 8.6 Shropshire Council expects infrastructure needs and 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 SHF013. 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 SHF013 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 SHF013 stated *"SHF013 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 SHF013 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 2034/35. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of SHF013 stated "*SHF013 is viable and deliverable but the timescale is likely to be short term rather than medium term.*" SHF013 is therefore expected to be delivered earlier in this timescale on the adoption of the Local Plan.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation SHF013 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 SHF013.
- 11.3. SHF013 is located within an existing residential area and its boundary comprises the last area of safeguarded land in the north of Shifnal. The site adjoins Meadow Drive on its western and southern boundaries, the embankment of the elevated M54 to the north, and open land extending to the residential curtilages of properties on the distant Coppice Green Lane 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 SHF013 within Schedule S15.1(i) of draft Policy S15.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of SHF013; 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 SHF013.

- 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 SHF013 – 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 SHF013.
- 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 SHF013, 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 SHF013. These are summarised in SD014.01 and GC4o.

- 12.9 The single objection to SHF013 required that the site capacity be increased from 65 dwellings to 116 dwellings and also the site capacity for SHF022 & SHF023 increase from 100 dwellings to 160 dwellings. These increases in site density were considered necessary to make the size and density of allocated sites clear, appropriate and unambiguous. Shropshire Council considers the proposed capacity of SHF013 is appropriate and accords with the site assessment of SHF013 and the strategy and policies of the Plan.
- 12.10 These increases in site density were considered necessary to permit the removal of proposed allocation SHF015 & SHF029 from the Plan. The removal of SHF015 & SHF029 was considered necessary to protect the ecological value of these sites. The site assessment of SHF015 & SHF029 has appropriately considered the ecological value of the site. The site guidelines provide the necessary mitigation measures to ensure the delivery of sustainable development that protects the environmental value of the site.
- 12.11 SHF015 & SHF029 has been carefully considered and the site guidelines provide clear and detailed guidance for any 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 SHF015 & SHF029 – Land adjoining Beech House between A464 and Park Lane, Shifnal

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 residential allocation SHF015 & SHF029 comprises 3.85 hectares which is proposed for 65 dwellings. The site adjoins the A464 Wolverhampton Road to the east and the rural lane of Park Lane to the west. The site bounded to the north by the residential curtilages of the recent housing developments to the south of Shifnal. The site is bounded to the south by the Green Belt but this land is proposed to be released from the Green Belt and safeguarded for future development.
- 1.2. The site adjoins a recently developed residential area and the current status of SHF015 & SHF029 as the last area of safeguarded land in the south of Shifnal would promote the development of the site for housing use. The presence of Beech House with its

established garden curtilage and out-buildings also establish an existing urban, residential character and a sense of place.

- 1.3. The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the town and protects the character and historical significance of Beech House.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 8 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Shifnal is summarised within SD006.17.
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process was a screening exercise which considered the availability; size and strategic suitability of the site. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where uncertainty remained about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints were considered to show the site was unsuitable for development.

- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.9. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shifnal Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of the planning application register, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 38 sites were considered at Shifnal. Within Stage 3 of the site assessment process, around 29 sites were considered at Shifnal.
- 1.12. SHF015 & SHF029 was proactively promoted for residential development during the plan-making process and ultimately identified as a proposed residential allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHF015 & SHF029 was identified as a proposed residential allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of SHF015 & SHF029 as a proposed allocation. These objections are summarised in SD014.01 and GC4o.

1.15. They included:

- a. An objection that required the removal of proposed allocation SHF015 & SHF029 from the Plan with complementary capacity provided on both SHF013 and on SHF022 & SHF023 to meet the housing guideline figure for Shifnal. Shropshire Council considers that identification of this proposed allocation was informed by a proportionate and robust site assessment. This assessment process fully justifies the identification of SHF015 & SHF029 as a proposed allocation. Shropshire Council also considers that an appropriate and deliverable development strategy is proposed for Shifnal.
- b. An objection that required the removal of proposed allocation SHF015 & SHF029 from the Plan to protect the ecological value of the site. Shropshire Council considers that identification of this proposed allocation was informed by a proportionate and robust site assessment, which included consideration of ecological matters informed by analysis by Ecology Officers. This assessment process fully justifies the identification of SHF015 & SHF029 as a proposed allocation.

1.16. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation included support and objection to the site assessment process which identified SHF015 & SHF029 as an appropriate location for housing development. These responses are summarised in GC52. There were no further objections to SHF015 & SHF029 in response to this additional consultation.

1.17. In conclusion, Shropshire Council considers that SHF015 & SHF029 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 8 of GC44.

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

Shropshire Council Response:

2.1. SHF015 & SHF029 are joined sites providing two separate road frontages at either end of the site. These joined sites are proposed as a single site allocation for residential development comprising 3.85ha of previously developed land on the extended curtilage and naturalised land surrounding Beech House. These joined sites form an 'infilling' site on the southern edge of Shifnal which is designated as a Key Centre and the approximate site provision figure is for 65 dwellings.

- 2.2. Detailed development guidelines within Schedule S15.1(i) of draft Policy S15.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated 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 would be expected to provide a broad range of housing with dwelling types and sizes to help meet local housing needs with potential for lower cost housing, age specific housing and policy compliant affordable housing.
- 2.5. The allocation does not include Beech House (which is protected as a non-designated heritage asset HER PRN 34751) and its immediate garden, curtilage buildings and frontage walling to A464. However, Beech House now forms part of the urban form of Shifnal and is no longer safeguarded for future development. The Council recognises that consideration may be given to a sympathetic restoration/conversion of Beech House and its curtilage buildings at some future date.

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 S15.1(i) of draft Policy S15.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of SHF015 & SHF029.
- 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. SHF015 & SHF029 are currently the subject of discussions between the Council and the site promoter about specific details for the development with a view to submitting an application on the adoption of the Local Plan. This site has a planning history which did not identify a suitable proposed scheme for the site.

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

Shropshire Council Response:

- 5.1 The proposed residential allocation SHF015 & SHF029 comprises 3.85 hectares which is proposed for 65 dwellings. The site adjoins the A464 Wolverhampton Road to the east and the rural lane of Park Lane to the west. The site bounded to the north by the residential curtilages of the recent housing developments to the south of Shifnal. The site is bounded to the south by the Green Belt but this land is proposed to be released from the Green Belt and safeguarded for future development.
- 5.2 The site is the last area of safeguarded land in the south of Shifnal and is located within an existing residential area. This is considered to promote the site for development for residential use. housing. The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.3 SHF015 & SHF028 adjoin Beech House (which is protected as a non-designated heritage asset HER PRN 34751) and its immediate garden, curtilage buildings and frontage walling to A464. SHF015 & SHF028 does not include Beech House which now forms part of the urban form of Shifnal and is no longer safeguarded for future development.
- 5.4 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.
 - b. The use of existing safeguarded land previously removed from the Green Belt for development which avoids the need to release further Green Belt land to meet housing needs in Shifnal.
 - c. Site is located in an area which has recently accommodated residential development and SHF013 will make sustainable use of recent physical infrastructure investments in south Shifnal.

- 5.5 Furthermore, Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Shifnal and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of SHF015 & SHF029 and the wider draft policies in the draft Shropshire Local Plan.
- 5.6 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. Site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs with potential for lower cost housing, family housing and policy compliant affordable housing.
 - b. Layout and landscaping to consider effect of noise due to proximity to surrounding highway network. Layout of dwellings might consider stand-off from north and A464, orientation of dwellings with possible acoustic fencing and additional tree and hedgerow planting.
 - c. Dwelling design along edge of site should consider enhancement of façade design with glazing solutions and internal layout of living spaces to mitigate for noise impacts.
 - d. Allocation does not include Beech House (non-designated heritage asset HER PRN 34751) with garden, curtilage building and frontage walling to A464. Beech House will be conserved and the setting protected from the effects of development and a safe and visible highway junction provided to the A464.
 - e. Beech House now forms part of urban land and no longer safeguarded for future development. Consideration may be given to sympathetic restoration/conversion of house and curtilage buildings.
 - f. Highway junction to be situated at northern point on A464 frontage beyond the northern access to Beech House which is proposed to be closed to traffic. This will provide safe junction to SHF015 & SHF029 with good visibility onto the A464.
 - g. Highway junction to have adequate highway drainage, speed restrictions to be moved beyond the junction with traffic calming to create a visible and safe gateway into Shifnal.
 - h. Development should provide access to the footway and cycling network along the A464 to improve access to local services using 'active travel' options to walk, 'wheel' or cycle to local services.

- i. Consideration to be given to internal highway layout within the site to make effective use of the developable land and to improve the accessibility of the dwellings to the main and secondary accesses to encourage 'active travel' options to reach local services.
 - j. Consideration to be given to secondary access to Park Lane through access strip from backland boundary of site. Secondary access to provide pedestrian and cycling access to Park Lane offering a potentially safer access to local services including the local primary school and with emergency vehicular access into the site only.
 - k. Any other necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - l. Landscaping and open space with equipped play spaces to retain mature trees within and adjoining site (subject to highway safety requirements) particularly to protect western Tree Preservation Order, foraging / passage of species through site and use of habitat on site margins particularly for Great Crested Newts whose presence may reduce site capacity.
 - m. Site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy particularly around the ponds and further north along the boundary to the Green Belt/safeguarded land.
 - n. Any residual surface water flood risk to be managed by excluding development from buffer around the ponds to form part of Green Infrastructure network. Flood and water management measures must not displace water elsewhere particularly to adjacent, proposed safeguarded land.
- 5.7 More generally, it is also considered that development of SHF015 & SHF029 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 SHF015 & SHF029 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 SHF015 & SHF029.

- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF015 & SHF029 constituted an appropriate 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 SHF015 & SHF029 within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Site includes substantial unlisted historic building known as Beech House, which is considered to be a non-designated heritage asset. Site guidelines include the following measures:
 - i. Exclude Beech House (non-designated heritage asset HER PRN 34751) with garden, curtilage building and frontage walling to A464.
 - ii. To conserve Beech House, protect the setting from effects of development and to deliver a safe and visible highway junction to A464 may require removal of mature trees with complementary planting within site.
 - iii. Relevant supporting studies to be undertaken for impact on Beech House and archaeology of developable land, with recommendations reflected in proposed development.
 - b. Consideration should be given to a shared main road junction with other sites off the A464. Site guidelines require existing northern access to Beech House to be closed and sealed with existing gates retained. Beech House to be serviced from existing southern access.
 - c. Highway access should be provided onto the A464. Site guidelines require a highway junction to be situated at northern point on A464 frontage beyond the northern access to Beech House which is proposed to be closed to traffic. This will provide safe junction to SHF015 & SHF029 with good visibility onto the A464.
 - d. SHF029 should have accessibility through its frontage onto Park Lane. Site guidelines require Consideration to be given to secondary access to Park Lane through access strip from backland boundary of site. Secondary access to provide pedestrian and cycling access to Park Lane offering a potentially

- safer access to local services including the local primary school and with emergency vehicular access into the site only.
- e. Reduce number of houses because the western boundary is part of an environmental network, site has a Tree Protection Order and there are Great Crested Newt in a pond on the south-western boundary. Site guidelines require the following measures:
 - i. Landscaping and open space to protect western Tree Preservation Order, foraging / passage of species through site and use of habitat on site margins particularly for Great Crested Newts whose presence may reduce site capacity.
 - ii. Consideration to be given to internal highway layout within the site to make effective use of the developable land, this will also improve the accessibility of the dwellings to the main and secondary accesses to encourage 'active travel' options to reach local services.
 - iii. Relevant supporting studies to be undertaken for detailed ecological assessments particularly the presence of Great Crested Newts, tree survey particularly around Tree Preservation Order close to Park Lane with recommendations reflected in proposed development.
 - f. Layout and design should retain significant trees to improve amenity of the development. Site guidelines require landscaping and open space with equipped play spaces to retain mature trees within and adjoining site subject to highway safety requirements. Requirement to deliver a safe and visible highway junction to A464 may require removal of mature trees with complementary planting within site.
 - g. Layout, orientation design and building details should mitigate road noise from A464 through stand-off distance, glazing and ventilation. Site guidelines require the following measures:
 - i. Layout and landscaping to consider effect of noise due to proximity to surrounding highway network. Layout of dwellings might consider stand-off from north and A464, orientation of dwellings with possible acoustic fencing and additional tree and hedgerow planting.
 - ii. Dwelling design along edge of site should consider enhancement of façade design with glazing solutions and internal layout of living spaces to mitigate for noise impacts.
 - iii. Relevant supporting studies to be undertaken for traffic assessments, noise assessment with recommendations reflected in proposed development.
 - h. A small area of SHF015 & SHF029 is in the surface water flood risk zones in severe conditions, SHF029 is within the national reservoir inundation mapping and both areas lie over a Source

Protection Zone. Site guidelines require appropriate sustainable drainage, informed by a sustainable drainage strategy particularly around the ponds and along the boundary to the Green Belt and proposed safeguarded land. Relevant supporting studies to be undertaken for surface water flood risk around ponds with recommendations reflected in proposed development.

- i. Medium-high visual sensitivity. This has been appropriately considered within the site assessment and the site guidelines require.
- j. Location within a Coal Authority reference area. This has been appropriately considered within the site assessment.
- k. Applying the precautionary principle, the site consists of best and most versatile agricultural land. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation SHF015 & SHF029 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at SHF015 & SHF029 recognises a limited fluvial flood risk to the proposed allocated sites which are located entirely within Flood Zone 1, which is the lowest risk of flooding. The flood risk also recognises:
 - a. Around 1% of SHF029 lies within the 100 year surface flood risk zones.
 - b. Around 3% of SHF015 and 1% of SHF029 lies within the 1,000 year surface flood risk zone which would limit development on the site.

- 7.5. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths. These measures would manage surface water flood risks during severe conditions.
- 7.6. The proposed site guidelines for SHF015 & SHF029 within Schedule S15.1(i) of draft Policy S1.1 address site specific flood risk issues, stating *"Site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy particularly around the ponds and further north along the boundary to the Green Belt/safeguarded land. Any residual surface water flood risk to be managed by excluding development from buffer around the ponds to form part of Green Infrastructure network. Flood and water management measures must not displace water elsewhere particularly to adjacent safeguarded land."* These ponds are located along the northern site boundary where ground depressions collect ground and surface water which forms a marine habitat especially for Great Crested Newts.
- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation SHF015 & SHF029 passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for SHF015 & SHF029 address this issue, stating: *"Relevant supporting studies to be undertaken for traffic assessments, heritage impact on Beech House and archaeology of developable land, detailed ecological assessments particularly the presence of Great Crested Newts, tree survey particularly around Tree Preservation Order close to Park Lane, surface water flood risk around ponds, noise assessment with recommendations reflected in proposed development."*

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 SHF015 & SHF029 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 SHF015 & SHF029.

- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF015 & SHF029 constituted an appropriate proposed residential allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for SHF015 & SHF029 within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5 The site guidelines include:
 - a. Allocation does not include Beech House (non-designated heritage asset HER PRN 34751) with garden, curtilage building and frontage walling to A464 therefore:
 - i. Existing northern access to Beech House to be closed and sealed with existing gates retained. Beech House to be serviced from existing southern access.
 - ii. To conserve Beech House, protect the setting from effects of development and to deliver a safe and visible highway junction to A464 may require removal of mature trees with complementary planting within site.
 - b. Highway junction to be situated at northern point on A454 frontage beyond the northern access to Beech House which is proposed to be closed to traffic. This will provide safe junction into SHF015 & SHF029 with good visibility onto the A464.
 - c. Highway junction to have adequate highway drainage, speed restrictions to be moved beyond the junction with traffic calming to create a visible and safe gateway into Shifnal.
 - d. Any other necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).

- e. Consideration to be given to secondary access to Park Lane through access strip from backland boundary of site. Secondary access to provide pedestrian and cycling access to Park Lane offering a potentially safer access to local services including the local primary school and with emergency vehicular access into the site only.
 - f. Development should provide access to the footway and cycling network along the A464 to improve access to local services using 'active travel' options to walk, 'wheel' or cycle to local services.
 - g. Consideration to be given to internal highway layout within the site to make effective use of the developable land and to improve the accessibility of the dwellings to the main and secondary accesses to encourage 'active travel' options to reach local services.
 - h. Landscaping and open space with equipped play spaces to retain mature trees within and adjoining site (subject to highway safety requirements) particularly to protect western Tree Preservation Order, foraging / passage of species through site and use of habitat on site margins particularly for Great Crested Newts whose presence may reduce site capacity.
 - i. Site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy particularly around the ponds and further north along the boundary to the Green Belt/safeguarded land.
 - j. Any residual surface water flood risk to be managed by excluding development from buffer around the ponds to form part of Green Infrastructure network. Flood and water management measures must not displace water elsewhere particularly to adjacent, proposed safeguarded land.
- 8.6 Shropshire Council expects infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7 The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHF015 & SHF029. 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 SHF015 & SHF029 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 SHF015 & SHF029 stated *"We represent a proposed allocated site and therefore we would be pleased to have the opportunity to answer any questions the Inspector may have and to demonstrate that the site is available and deliverable."*

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation SHF015 & SHF029 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 these expected timescales and rates of delivery are both realistic and deliverable.

- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of SHF015 & SHF029 stated "*We represent a proposed allocated site and therefore we would be pleased to have the opportunity to answer any questions the Inspector may have and to demonstrate that the site is available and deliverable.*" SHF015 & SHF029 is expected to be delivered early in this timescale on the adoption of the Local Plan.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation SHF015 & SHF029 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 SHF015 & SHF029.
- 11.3. SHF015 & SHF029 is located within an existing residential area and its boundary comprises the last area of safeguarded land in the south of Shifnal. The site adjoins the A464 Wolverhampton Road to the east and the rural lane of Park Lane to the west. The site bounded to the north by the residential curtilages of the recent housing developments to the south of Shifnal. The site is bounded to the south by the Green Belt but this land is proposed to be released from the Green Belt and safeguarded for future development.

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 SHF015 & SHF029 within Schedule S15.1(i) of draft Policy S15.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of SHF015 & SHF029; 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 SHF015 & SHF029.
- 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 SHF015 & SHF029 – 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 SHF015 & SHF029.
- 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 SHF015 & SHF029, 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 SHF015 & SHF029. These are summarised in SD014.01 and GC4o.
- 12.9 The two objections to SHF015 & SHF029 sought to remove the site from the Plan by increasing the site capacities of SHF013 to 116 dwellings (from 65 dwellings) and SHF022 & SHF023 to 160 dwellings (from 100 dwellings). This suggested amendment sought to provide compensatory housing capacity to meet the housing guideline for Shifnal but on fewer sites.
- 12.10 The second objection considered the removal of SHF015 & SHF029 was necessary to protect the ecological value of the site. The site assessment has appropriately considered the ecological value of the site. The site guidelines provide the necessary mitigation measures to ensure the delivery of sustainable development that protects the environmental value of SHF015 & SHF029.
- 12.11 Shropshire Council considers the proposed allocation SHF015 & SHF029 is an appropriate housing site. The designation of SHF015 & SHF029 as the residual safeguarded land in the south of Shifnal and the adjoining, recent housing development with its physical infrastructure investment and the presence of Beech House will promote the development of SHF015 & SHF029 for housing use.
- 12.12 SHF015 & SHF029 has been carefully considered and the site guidelines provide clear and detailed guidance for any development.
- 12.13 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 SHF022 & SHF023 – Land between Windmill View and The Monument on A464, Shifnal

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 residential allocation SHF022 & SHF023 comprises 4.0 hectares which is proposed for 100 dwellings. The site adjoins the A464 Wolverhampton Road to the south and the wooded area of

Revells Rough to the north. To the west, SHF022 adjoins the recent housing development on the eastern edge of the town and to the east, SHF023 lies in the setting of the heritage asset of the Windmill monument with adjoining fishing ponds.

- 1.2. The site adjoins a recently developed residential area to the east and the current status of SHF022 & SHF023 as part of the last area of safeguarded land in the east of Shifnal would promote the development of the site for housing use.
- 1.3. The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the town and protects the character and historical significance of Beech House.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process are part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (EV006.01-EV006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 8 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Shifnal is summarised within SD006.17.
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process was a screening exercise which considered the availability; size and strategic suitability of the site. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and those Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for the remaining Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where uncertainty remained about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject

to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints were considered to show the site was unsuitable for development.

- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, where conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.9. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal (SD006.05), Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shifnal Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of the planning application register, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 38 sites were considered at Shifnal. Within Stage 3 of the site assessment process, around 29 sites were considered at Shifnal.
- 1.12. SHF022 & SHF023 was proactively promoted for residential development during the plan-making process and ultimately identified as a proposed residential allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SHF022 & SHF023 was identified as a proposed residential allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of SHF022 & SHF023 as a proposed allocation. These objections are summarised in SD014.01 and GC4o.
- 1.15. They included an objection required the site capacity be increased from 160 dwellings to 276 dwellings [along with a site capacity increase for SHF013] to permit the removal of proposed allocation SHF015 & SHF029 from the Plan. Shropshire Council considers the site assessment process gave appropriate consideration to constraints and opportunities on the site and appropriately informed its proposed capacity. Shropshire Council also considers that an appropriate and deliverable development strategy is proposed for Shifnal.
- 1.16. Shropshire Council is aware that responses to the Post Stage 1 Interim Findings Consultation included support and objection to the site assessment process which identified SHF022 & SHF023 as an appropriate location for housing development. These responses are summarised in GC52. There were no further objections to SHF022 & SHF023 in response to this additional consultation.
- 1.17. In conclusion, Shropshire Council considers that SHF022 & SHF023 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 8 of GC44.

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

Shropshire Council Response:

- 2.1. SHF022 & SHF023 are joined sites providing an extended frontage along the A464 Wolverhampton Road. These joined sites are proposed as an enlarged single site allocation for residential development comprising 4.0ha of greenfield land which abuts up to the protected woodland of Revells Rough. These joined sites form an extension to the east of Shifnal which is designated as a Key Centre and the approximate site provision figure is for 100 dwellings.
- 2.2. Detailed development guidelines within Schedule S15.1(i) of draft Policy S15.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated 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. This development would be expected to provide a broad range of housing with dwelling types and sizes to help meet local housing needs with potential for family housing, age specific housing and policy compliant affordable housing.
- 2.5. The allocation is adjacent to the existing residential development on Windmill Lane but is physically separated by an area of open land which provides an easement and maintenance corridor for underground services and the land will provide amenity space for the adjoining residential areas.

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 S15.1(i) of draft Policy S15.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of SHF022 with SHF023.
- 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 The proposed residential allocation SHF022 & SHF023 comprises 3.85 hectares which is proposed for 65 dwellings. The site adjoins the A464 Wolverhampton Road to the south and the wooded area of Revells Rough to the north. To the west, SHF022 adjoins the recent housing development on the eastern edge of the town and to the east, SHF023 lies in the setting of the heritage asset of the Windmill monument with adjoining fishing ponds.
- 5.2 SHF022 & SHF023 comprises part of the last area of safeguarded land in the east of Shifnal and is located within an existing residential area. This is considered to promote the site for development for residential use. housing. The proposed policy framework will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.3 SHF022 & SHF023 adjoin Beech House (which is protected as a non-designated heritage asset HER PRN 34751) and its immediate garden, curtilage buildings and frontage walling to A464. SHF015 & SHF028 does not include Beech House which now forms part of the urban form of Shifnal and is no longer safeguarded for future development.
- 5.4 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.
 - b. The use of existing safeguarded land previously removed from the Green Belt for development which avoids the need to release further Green Belt land to meet housing needs in Shifnal.
 - c. Site is located in an area which has recently accommodated residential development and SHF013 will make sustainable use of recent physical infrastructure investments in south Shifnal.
- 5.5 Furthermore, Shropshire Council considers that through the proposed policy framework, development of the site would constitute sustainable development that contributes to the long-term sustainability of Shifnal and Shropshire. The proposed policy framework includes draft site guidelines addressing key requirements and considerations for the development of SHF022 & SHF023 and the wider draft policies in the draft Shropshire Local Plan.
- 5.6 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft

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

- a. Site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs with potential for family housing, age specific housing and policy compliant affordable housing.
- b. Layout and landscaping to consider effect of noise due to proximity to A464. Layout of dwellings to the south and possibly through the site to consider stand-off from A464, orientation of dwellings and additional tree and hedgerow planting.
- c. Dwelling design along south of site to consider enhancement of façade design with glazing solutions and internal layout of living spaces to mitigate for noise impacts.
- d. Sites SHF022 and SHF023 to be developed as a single housing area either simultaneously or through two interrelated development schemes.
- e. Site SHF022 to have highway access from Windmill View through the strategic roundabout junction on A464 serving the adjacent development.
- f. The access from Windmill View into site SHF022 will connect the new development into the existing footway network and to the pedestrian routes to the town centre. T
- g. The development scheme for SHF022 will provide highway accesses into the boundary of site SHF023 to link this site into the highway network within the town. The development should provide access to the footway and cycling network along the A464 to improve access to local services using 'active travel' options to walk, 'wheel' or cycle to local services.
- h. Site SHF023 will provide a highway junction with A464 on the eastern end of the southern boundary. Highway access to have adequate highway drainage, speed restrictions moved to the east of the junction with traffic calming to create a safe and visible gateway into Shifnal.
- i. Site SHF023 to provide a stronger boundary to the urban area of Shifnal to properly define the Green Belt boundary.
- j. Landscaping to protect trees and central hedgerow and open space, with consideration of equipped play space, to be located where the combined provision on the two adjacent sites enhances the Green Infrastructure provision.
- k. Revells Rough to be protected and buffered by both developments with conservation and enhancement of the woodland through development of SHF023 by the controlling owner.

- l. Consideration to be given to the physical separation of sites SHF022 and SHF023 from safeguarded land to the north due to highway capacity constraints on Lamledge Lane with its restricted viaduct over the rail line.
 - m. Sites SHF022 and SHF023 to incorporate appropriate inter-related sustainable drainage, informed by sustainable drainage strategy particularly on the lower lying SHF023.
 - n. Any residual surface water flood risk to be managed by excluding development from this area to provide SuDS to form part of Green Infrastructure network. Flood and water management measures must not displace water elsewhere particularly from one site into the other.
- 5.7 More generally, it is also considered that development of SHF022 & SHF023 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 SHF022 & SHF023 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 SHF022 & SHF023.
- 6.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF022 & SHF023 constituted an appropriate 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 SHF022 & SHF023 within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4 In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. Layout, orientation design and building details should mitigate road noise from A464 through stand-off distance, glazing and ventilation. Site guidelines require the following measures:

- i. Layout and landscaping to consider effect of noise due to proximity to A464.
 - ii. Layout of dwellings to the south and possibly through the site to consider stand-off from A464, orientation of dwellings and additional tree and hedgerow planting.
 - iii. Dwelling design along south of site to consider enhancement of façade design with glazing solutions and internal layout of living spaces to mitigate for noise impacts.
- b. Consideration should be given to a shared main road junction with other sites off the A464 to ensure SHF022 & SHF023 integrate into the existing urban form of Shifnal. Site guidelines require the following:
 - i. SHF022 to have highway access from Windmill View through the strategic roundabout junction on A464 serving the adjacent development.
 - ii. The access from Windmill View into site SHF022 will connect the new development into the existing footway network and to the pedestrian routes to the town centre.
 - iii. The development scheme for SHF022 will provide highway accesses into the boundary of site SHF023 to link with this site.
- c. Highway access should also be provided onto the A464 to ensure SHF0122 & SHF023 are not backland development. Site guidelines require the following:
 - i. Site SHF023 will provide a highway junction with A464 on the eastern end of the southern boundary. Highway access to have adequate highway drainage, speed restrictions moved to the east of the junction with traffic calming to create a safe and visible gateway into Shifnal.
 - ii. The development should provide access to the footway and cycling network along the A464 to improve access to local services using 'active travel' options to walk, 'wheel' or cycle to local services.
 - iii. Any other necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - iv. The gateway treatment at the junction with SHF023 may not be necessary after development of site SHF015 [with SHF029] situated further east along the A464.
- d. Reduce the developable area to protect an environmental network including the presence of woodland providing an opportunity to enhance habitat and connectivity for Great Crested Newts. Site guidelines require the following:

- i. Detailed ecological assessment to consider the need for foraging / passage of species through site and use of habitat on site margins particularly for Great Crested Newts whose presence may reduce site capacity.
 - ii. Consideration to be given to the physical separation of sites SHF022 and SHF023 from safeguarded land to the north due to highway capacity constraints on Lamledge Lane with its restricted viaduct over the rail line.
 - iii. Relevant supporting studies to be undertaken detailed ecological assessments particularly the presence of Great Crested Newts, tree survey particularly of Revells Rough and central hedgerow separating SHF022 and SHF023, with recommendations reflected in proposed development.
- e. Assess the impact on heritage assets with previous Heritage Assessment by Waterman CMP Ltd still largely valid. Site guidelines require the following:
 - i. Relevant supporting studies to be undertaken heritage impact on surrounding assets and archaeology of developable land, with recommendations reflected in proposed development.
 - ii. Heritage Impact Assessment should ensure the development will respect the Windmill monument to the east and conserve any archaeological potential of the site.
- f. Conserve hedgerows and mature tree to south and east site boundaries and mature woodland to the north. Site guidelines require the following:
 - i. Landscaping to protect trees and central hedgerow and open space, with consideration of equipped play space, to be located where the combined provision on the two adjacent sites enhances the Green Infrastructure provision.
 - ii. Revells Rough to be protected and buffered by both developments with conservation and enhancement of the woodland through development of SHF023 by the controlling owner.
- g. SHF022 & SHF023 lie over a Source Protection Zone. Site guidelines require the following measures.
 - i. SHF022 and SHF023 to incorporate appropriate inter-related sustainable drainage, informed by sustainable drainage strategy particularly on the lower lying SHF023.
 - ii. Any residual surface water flood risk to be managed by excluding development from this area to provide SuDS to form part of Green Infrastructure network.
 - iii. Flood and water management measures must not displace water elsewhere particularly from one site into the other.

- h. Medium-high visual sensitivity. This has been appropriately considered within the site assessment. and the site guidelines require Revells Rough to be protected and buffered by both developments with conservation and enhancement of the woodland, protection of trees and central hedgerow and open space to enhance the Green Infrastructure provision.
- i. Location within a Coal Authority reference area. This has been appropriately considered within the site assessment.
- j. Applying the precautionary principle, the site consists of best and most versatile agricultural land. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation SHF022 & SHF023 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at SHF022 & SHF023 recognises a limited fluvial flood risk to the proposed allocated sites which are located entirely within Flood Zone 1, which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across site SHF022 but the flood risk recognises:
 - a. Around 1% of SHF023 lies within the 30 year and 100 year surface flood risk zones.
 - b. Around 3% of SHF023 lies within the 1,000 year surface flood risk zone which would limit development on the site.
- 7.5. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths. These measures would manage surface water flood risks during severe conditions.

- 7.6. The proposed site guidelines for SHF022 & SHF023 within Schedule S15.1(i) of draft Policy S15.1 address site specific flood risk issues, stating *“Sites SHF022 and SHF023 to incorporate appropriate inter-related sustainable drainage, informed by sustainable drainage strategy particularly on the lower lying SHF023. Any residual surface water flood risk to be managed by excluding development from this area to provide SuDS to form part of Green Infrastructure Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Page 260 Site Allocation Development Guidelines Provision network. Flood and water management measures must not displace water elsewhere particularly from one site into the other.”*
- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation SHF022 & SHF023 passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which ‘trigger’ the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for SHF022 & SHF023 within Schedule S15.1(i) of draft Policy S15.1 address this issue, stating: *“Relevant supporting studies to be undertaken for traffic assessments, heritage impact on surrounding assets and archaeology of developable land, detailed ecological assessments particularly the presence of Great Crested Newts, tree survey particularly of Revells Rough and central hedgerow separating SHF022 and SHF023, surface water flood risk, noise assessments with recommendations reflected in proposed development.”*

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 SHF022 & SHF023 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 SHF022 & SHF023.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SHF022 &

SHF023 constituted an appropriate proposed residential allocation; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.

- 8.3 The draft site guidelines for SHF022 & SHF023 within Schedule S15.1(i) of draft Policy S15.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5 The site guidelines include:
 - a. Site SHF022 to have highway access from Windmill View through the strategic roundabout junction on A464 serving the adjacent development.
 - b. The access from Windmill View into site SHF022 will connect the new development into the existing footway network and to the pedestrian routes to the town centre and the services in the town.
 - c. The development scheme for SHF022 will provide highway accesses into the boundary of site SHF023 to link this site into the highway network within the town. The development should provide access to the footway and cycling network along the A464 to improve access to local services using 'active travel' options to walk, 'wheel' or cycle to local services.
 - d. Site SHF023 will provide a highway junction with A464 on the eastern end of the southern boundary. Highway access to have adequate highway drainage, speed restrictions moved to the east of the junction with traffic calming to create a safe and visible gateway into Shifnal.
 - e. Any other necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - f. Landscaping to protect trees and central hedgerow and open space, with consideration of equipped play space, to be located where the combined provision on the two adjacent sites enhances the Green Infrastructure provision.

- g. Sites SHF022 and SHF023 to incorporate appropriate inter-related sustainable drainage, informed by sustainable drainage strategy particularly on the lower lying SHF023.
 - h. Landscaping to protect trees and central hedgerow and open space, with consideration of equipped play space, to be located where the combined provision on the two adjacent sites enhances the Green Infrastructure provision.
 - i. Revells Rough to be protected and buffered by both developments with conservation and enhancement of the woodland through development of SHF023 by the controlling owner.
 - j. SHF022 and SHF023 to incorporate appropriate inter-related sustainable drainage, informed by sustainable drainage strategy particularly on the lower lying SHF023.
- 8.6 Shropshire Council expects infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7 The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SHF022 & SHF023. 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 SHF022 & SHF023 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 SHF022 & SHF023 stated "*Policy S15.1 and specifically site allocations SHF022 and SHF023 – which can be delivered by L&Q Estates without third-party constraints – are considered to be robust and deliverable for plan-making purposes.*"

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 SHF022 & SHF023 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 these expected timescales and rates of delivery are both realistic and deliverable.
- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of SHF022 & SHF023 stated "SHF022...is viable and deliverable and the timescale is correct. *Policy S15.1 and specifically site allocations SHF022 and SHF023 – which can be delivered by L&Q Estates without third-party constraints – are considered to be robust and deliverable for plan-making purposes.*" SHF015 & SHF029 is expected to be delivered early in this timescale on the adoption of the Local Plan.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation SHF022 & SHF023 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 SHF022 & SHF023.
- 11.3. SHF022 & SHF023 is located within an existing residential area and its boundary comprises part of the last area of safeguarded land in the east of Shifnal. The site adjoins the A464 Wolverhampton Road to the south and the wooded area of Revells Rough to the north. To the west, SHF022 adjoins the recent housing development on the eastern edge of the town and to the east, SHF023 lies in the setting of the heritage asset of the Windmill monument with adjoining fishing ponds.

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 SHF022 & SHF023 within Schedule S15.1(i) of draft Policy S15.1 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of SHF022 & SHF023; 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 SHF022 & SHF023.
- 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 SHF022 & SHF023 – 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 SHF022 & SHF023.
- 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 SHF022 & SHF023, 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 SHF022 & SHF023. These are summarised in SD014.01 and GC4o.
- 12.9 The objections to SHF022 & SHF023 sought to increase their site capacities to 160 dwellings along with an increase in the capacity of SHF013 to 116 dwellings. This was sought in order to remove SHF015 & SHF029 from the Plan and still meet the housing guideline for Shifnal. The increase in the density of SHF022 &

SHF023 was considered necessary to make the size and density of allocated sites clear, appropriate and unambiguous.

- 12.10 The removal of SHF015 & SHF029 was considered necessary to protect the ecological value of these sites. The site assessment of SHF015 & SHF029 has appropriately considered the ecological value of the site. The site guidelines provide the necessary mitigation measures to ensure the delivery of sustainable development that protects the environmental value of the site.
- 12.11 SHF015 & SHF029 has been carefully considered and the site guidelines provide clear and detailed guidance for any 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.