

Shropshire Local Plan Examination

Shropshire Council Response to:

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

Matter 20



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 Oswestry Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Oswestry Place Plan area is established within draft settlement policies S14.1-S14.4, and then appropriately expanded upon through the other policies of the draft Shropshire Local Plan.
- 1.3. These draft settlement policies align with and implement the proposed strategic approach to the level and distribution of development across Shropshire – particularly the principle of urban focus; but crucially are also responsive to the characteristics, constraints, and opportunities of the various settlements in the Place Plan area.
- 1.4. In positively responding to the characteristics, constraints and opportunities of the settlements in the Oswestry Place Plan area, the draft Shropshire Local Plan identifies Oswestry, Gobowen, Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, St Martins, Trefonen, West Felton, Weston Rhyn, Whittington, Llanyblodwel, Porthywaen Dolgoch, Llyncllys Bryn Melyn, Park Hall, Hindford, Babbinswood and Lower Frankton, Rhoswiell, Wern Chirk Bank, Selattyn, Upper/Middle/Lower Hengoed, and Pant Glas as locations to accommodate development. Specifically:
 - a. Oswestry is proposed to be identified as a Principal Centre where growth will respond to need in the town, its surrounding hinterland and contribute towards achieving strategic growth objectives in the east of the County, consistent with the requirements of Policy S14.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Oswestry envisage the delivery of around 1,900 dwellings between 2016 and 2038 and that around 57ha of employment

land will be made available for employment development in order to create choice and competition in the market between 2016 and 2038.

- b. Gobowen, Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, St Martins, Trefonen, West Felton, Weston Rhyn and Whittington are significant rural service centres. As such, it is proposed they will be identified as Community Hubs where new development will respond to local needs consistent with Policy S16.2, Policy SP8, and other relevant policies of the Shropshire Local Plan.
 - i. Proposed development guidelines for Gobowen envisage the delivery of around 360 dwellings between 2016 and 2038.
 - ii. Proposed development guidelines for Kinnerley envisage the delivery of around 60 dwellings between 2016 and 2038.
 - iii. Proposed development guidelines for Knockin envisage the delivery of around 55 dwellings between 2016 and 2038.
 - iv. Proposed development guidelines for Llanymynech envisage the delivery of around 125 dwellings between 2016 and 2038.
 - v. Proposed development guidelines for Pant envisage the delivery of around 50 dwellings between 2016 and 2038.
 - vi. Proposed development guidelines for Ruyton XI Towns envisage the delivery of around 125 dwellings between 2016 and 2038.
 - vii. Proposed development guidelines for St Martins envisage the delivery of around 355 dwellings between 2016 and 2038.
 - viii. Proposed development guidelines for Trefonen envisage the delivery of around 35 dwellings between 2016 and 2038.
 - ix. Proposed development guidelines for West Felton envisage the delivery of around 130 dwellings between 2016 and 2038.
 - x. Proposed development guidelines for Weston Rhyn envisage the delivery of around 155 dwellings between 2016 and 2038.
 - xi. Proposed development guidelines for Whittington envisage the delivery of around 200 dwellings between 2016 and 2038.
- c. Llanyblodwel, Porthywaen Dolgoch, Llynclys and Bryn Melyn; Park Hall, Hindford, Babbinswood and Lower Frankton; Rhoswiell, Wern and Chirk Bank; and Selattyn, Upper/Middle/Lower Hengoed and Pant Glas are proposed to be identified as Community Clusters, where new development will respond to local needs, consistent with the requirements of Policy S16.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of these settlements, no specific development guidelines or site allocations are proposed.

- 1.5. In identifying any site allocations to contribute to the achievement of the strategies proposed for Oswestry, Gobowen, Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, St Martins, Trefonen, West Felton, Weston Rhyn and Whittington, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
- 1.6. Through this site assessment process one proposed residential-led mixed-use allocation is identified for Oswestry (PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032).
- 1.7. Also through this site assessment process one proposed residential allocation is identified at Gobowen (GWR009); one proposed residential allocation is identified at Knockin (KCK009); one proposed residential allocation is identified at Llanymynech (LYH007); one proposed residential allocation is identified at Pant (PYC021); one proposed residential allocation is identified at Ruyton XI Towns (RUY019); two proposed residential allocations are identified at St Martins (SMH031 and SMH038); one proposed residential allocation is identified at West Felton (WEF025); two proposed residential allocations are identified at Weston Rhyn (WRP001VAR and WRP017); and one proposed residential allocation is identified at Whittington (WHN024).
- 1.8. Within this site assessment process it was concluded that additional site allocations were unnecessary in order to achieve the proposed settlement strategies for Kinnerley and Trefonen.
- 1.9. The most recent iteration of the assessment work for these settlements is summarised within Appendix O (SD006.16) of the of Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.10. The Oswestry Place Plan area generally does not have any realistic functional relationship to the Black Country, due to its geographic location within Shropshire. As a result, none of the settlements in the Oswestry Place Plan area were identified as potential locations to accommodate proposed contributions to the Black Country.
- 1.11. Shropshire Council considers that development proposals in the Place Plan area will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire; contribute to the achievement of sustainable development that meets the needs of all groups within the communities of the Place Plan area; and support the long-term sustainability of Shropshire.
- 1.12. The Council considers the proposed approach to development in the Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.

- 1.13. 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).
- 1.14. The Council considers the proposed approach to development in the Place Plan area is effective as it includes a clear strategy and detailed criteria to manage development over the entire geography. This ensures a shared understanding amongst communities, developers and decision makers. As such, it is considered implementable and deliverable over the proposed plan period.
- 1.15. The Council considers the proposed approach to development in the Place Plan area is consistent with national policy. In particular it:
- a. Conforms with the principles of plan making in Chapter 3 of the 2021 National Planning Policy Framework (NPPF).
 - b. Supports delivery of sufficient and appropriate forms of housing, contributing to achievement of the housing needs of all groups within the communities of the Place Plan area, consistent with Chapter 5 of the NPPF.
 - c. Supports the delivery of sufficient and appropriate forms of employment within the Place Plan area, consistent with Chapter 6 of the NPPF.
 - d. Promotes the health and wellbeing of communities within the Place Plan area, consistent with Chapter 8 of the NPPF.
 - e. Ensures the vitality of local centres and supports access to and use of sustainable transport, services and facilities, consistent with Chapter's 7, 9 and 10 of the NPPF.
 - f. Positively responds to the built and natural environment, and the challenge of climate change, consistent with Chapter's 14-16 of the NPPF.

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

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

Shropshire Council Response:

- 1.1. Due to the limitations surrounding Oswestry for development, no housing allocations have been made in the town as part of this Local

Plan Review. Oswestry's housing requirement is therefore allocated in Park Hall to the north-east of the town. Park Hall is to maintain its designation as a Community Cluster with this emerging housing allocation.

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

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

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

allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032. These objections included:

- a. The site location presents conflicts - it is an allocation for Oswestry, but is some distance from the town in Whittington Parish and will benefit from employment sites in Gobowen Parish. Shropshire Council considers the proposed allocation constitutes a suitable location for development to meet the needs of Oswestry. The site has been identified through a proportionate and robust site assessment process.
- b. Allocation of CIL monies arising will be problematic. Shropshire Council considers that the CIL Regulations and draft Policy DP25 provide a clear framework for the allocation of CIL funds arising in Shropshire.
- c. Parts of these site were rejected in the SLAA but no mitigation is proposed within the Sustainability Appraisal (SA). Shropshire Council considers the proposed allocation has been identified through a proportionate and robust site assessment process. This site assessment process fully justifies the identification of this site as a proposed allocation.
- d. The allocations at Park Hall are not supported by proportionate evidence and are therefore unsound. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of this site as a proposed allocation.
- e. Do not consider road infrastructure (narrow; prone to flooding; parts are without pedestrian footways; and poorly maintained) or schools (oversubscribed) are sufficient to support the Park Hall allocation. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis by Highway Officers. This site assessment process fully justifies the identification of this site as a proposed allocation.
- f. Park Hall lacks local amenities to support this level of development. Shropshire Council considers the site assessment process gave appropriate consideration to infrastructure constraints and opportunities. This site assessment process fully justifies the identification of this site as a proposed allocation.

1.15. In conclusion, Shropshire Council considers that PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 were identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is proposed to be allocated for residential development with some ancillary commercial use. This site is some 12.21ha in size and the approximate site provision figure is 240 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.1(i) of draft Policy S14.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. This proposed allocation includes some ancillary commercial use to be incorporated into the site relating to the Derwen College and RJAH.

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

Shropshire Council Response:

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

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups for Oswestry Town and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Oswestry and Shropshire.
- 5.3. The site's location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; the Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines and site assessments. These include:
 - a. Ensuring the comprehensive development of the site, including the provision of vehicular, cyclist and pedestrian access between each component of the site and to the hospital and college.
 - b. Any necessary improvements to the local and strategic road network will be undertaken.
 - c. Provision for key worker dwellings in association with the RJAH hospital and Derwen College.
 - d. Ancillary commercial use in relation to the RJAH hospital and Derwen College to be incorporated into the site.

- e. In order to achieve an appropriate access into PKH032 off Twmpath Lane, a roundabout may be required.
 - f. The development should complete the footpath along North Drive to the west of the site.
- 5.5. More generally, it is also considered that development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 were identified and appropriately considered within the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 constituted an appropriate proposed residential 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. Contaminated land and unexploded ordnance on the site. Site guidelines require an appropriate assessment and management of contaminated land and unexploded ordnance.
 - b. The hedgerows and significant trees on the site should be retained and buffered. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

- c. Noise, dust, odour from nearby commercial activities and noise from the road and railway line in proximity of the site west. Site guidelines require appropriate boundary treatments and mitigation through design and layout of development and buffering. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- d. Agricultural holding to the north of the site. Site guidelines require appropriate boundary treatments.
- e. Potential impact on White Mere. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.1.
- f. An Environmental Network corridor runs along the eastern boundary of PKH032 and will need to be appropriately buffered. Site guidelines require appropriate boundary treatments and draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 7.4. With specific regard to flood risk at PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032, in summary:
 - a. With regard to fluvial flood risk, proposed allocation, 0.91% of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is located in Flood Zone 3, 0.91% is located in Flood Zone 2 and 98.18% is in Flood Zone 1.

- b. With regard to other sources of flood risk, around 2.08% of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is located within the 1,000 year surface flood risk zone. None of the site lies within the 30 or 100 year flood risk zones.
- 7.5. The proposed site guidelines for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032. It concluded that there was only a small amount of flood risk adjacent to the railway line, and that this area would likely form part of a buffer strip as part of the development layout. It is also deemed it unlikely that floodwater would be able to pass the railway line.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 were considered within stage 3 of the site assessment process. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 constituted an

appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.

- 8.3. The draft site guidelines for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines/site assessment outlined the following:
 - a. Ensuring the comprehensive development of the site – including provision of pedestrian, cyclist and vehicular access between all six components of the site and to the hospital and college.
 - b. Providing necessary improvements to the local and strategic road network. This may include the implementation of a roundabout on Twmpath Lane.
 - c. Providing appropriate access to the site.
 - d. The development should complete the footpath along North Drive to the west of the site.
 - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
 - f. A range of community services and infrastructure as part of a large scale planned mixed-use development on adjacent land. Survey for unexploded ordnance.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.

- 8.8. Of particular relevance is draft Policy DP25 which addresses the provision of infrastructure, ensuring that *"new development should only take place where there is sufficient existing infrastructure capacity available..."* or where *"...the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."* It also establishes the framework for funding infrastructure improvements through developer contributions.
- 8.9. Other draft policies of particular relevance include:
- a. Policies SP3 and DP11 which address climate change and carbon emissions.
 - b. Policies SP5 and SP6 which address high-quality design and health and wellbeing.
 - c. 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 PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 19 consultation responses the promoters of each of the six parcels which form the overall allocation confirmed that the site is viable and deliverable.

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).

- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2037/38. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is entirely appropriate and there is no justification for its amendment.
- 11.2. The extent and boundary of the proposed allocation was informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 11.3. The boundary for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 is defined by the railway line to the east, North Drive to the west; Agnes Hunt Drive/The Old Piggery development (circa 2018) to the south; and Twmpath Lane and some existing dwellings to the north.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 within Schedule S14.1(i) of draft Policy S14.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.3. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. Further information

on this site assessment process is provided within the response to Question 1 regarding proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.

- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan. They are also considered to be deliverable through the development of PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. This is because, alongside the draft policies in the draft Shropshire Local Plan, they provide the framework to ensure the achievement of sustainable development on PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.

- f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included comments on specific site guidelines proposed for PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032.
- 12.9. This includes concerns that whilst proposals for provision for key worker housing for the RJAH Hospital and Derwen College is welcomed, there is no mechanism to secure it. Shropshire Council considers that the site guidelines provide an appropriate mechanism to ensure provision of key worker housing.

Questions: Site Allocation GWR009 – Land west of Agnes Hunt Memorial Bungalows, Gobowen

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the south of the village of Gobowen. It is bounded by the railway line to the west, buildings associated with the Derwen College to the south and east and residential dwellings to the north. Access to the site is from the adjacent development on Southlands Avenue, which was an allocation under the adopted Shropshire Local Plan with site reference GOB008.
- 1.2. To inform the identification of proposed site allocations, including GWR009, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 3 of the additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.

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

- 1.10. Within Stages 2a and 2b of the site assessment process, around 17 sites were considered at Gobowen. Within Stage 3 of the site assessment process, around 9 sites were considered at Gobowen.
- 1.11. GWR009 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and GWR009 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is now aware of any representations during the Regulation 19 Pre-Submission Consultation that included objections to the site assessment process undertaken to identify proposed allocation GWR009.
- 1.14. In conclusion, Shropshire Council considers that GWR009 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. GWR009 is proposed to be allocated for residential development. This site is some 2.37ha in size and the approximate site provision figure is some 25 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft

Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation GWR009.

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

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. GWR009 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of GWR009 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Gobowen and Shropshire.
- 5.3. The site's location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines which includes that a low-density scheme will be

implemented which will respond to the specialist accommodation needs of nearby Derwen College.

- 5.5. More generally, it is also considered that development of GWR009 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing GWR009 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 GWR009.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that GWR009 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for GWR009 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There are existing mature trees and hedgerows on site. Site guidelines specify such trees should be maintained.
 - b. Noise associated with the adjoining railway line. Site guidelines require the design and layout of development and appropriate boundary treatments to mitigate noise from the railway line to the west of the site. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
 - c. Provision of a suitable water supply and foul-water disposal which will not adversely affect the River Dee SAC must be demonstrated via HRA for this site to be developed. The draft Shropshire Local Plan is supported by a HRA which has informed the requirements of draft Policy S14.2.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation GWR009.
- 7.4. With specific regard to flood risk at GWR009, the Sequential and Exception Test of allocated sites in the Pre-Submission Draft Local Plan (2020) confirms that this site has no flood risk. In summary:
 - a. With regard to fluvial flood risk, proposed GWR009 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, none of GWR009 is located within the 30, 100 or 1,000 year surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including GWR009. It concluded that the site GWR009 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of GWR009 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 GWR009.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that GWR009 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for GWR009 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. There are minimal infrastructure requirements for this allocation under the proposed Site Guidelines. However, the site access is dependent on the adjacent site, SAMDev reference GOB008. This site (Southlands Avenue) is commenced with 38 dwellings being developed. It is understood that 28 of these are due to be completed by the end of November 2024, with the remaining 10 following shortly after. The design and layout of this scheme allows for appropriate access into GWR009.
- 8.6. Shropshire Council expect any 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 GWR009 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 GWR009 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that following the Regulation 19 consultation, the promoter of GWR009 stated *"I confirm that the site, reference GWR009 would be available and deliverable for future development in line with our earlier submission."* This is confirmed in Appendix 9 of the Viability and Deliverability of Proposed Allocations Topic Paper (EV113).

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation GWR009 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 (and complete) in 2030/31. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would also note that following the Regulation 19 consultation, the promoter of GWR009 confirmed that they "*envisage that the total site is likely to be delivered in the medium term 2025/26-2029/30.*" This is confirmed in Appendix 9 of the Viability and Deliverability of Proposed Allocations Topic Paper (EV113).

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 GWR009 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 GWR009.
- 11.3. The boundary for GWR009 is defined by the railway line to the west, buildings associated with the Derwen College to the south and east and residential dwellings to the north.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for GWR009 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of GWR009; 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 GWR009.
- 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 GWR009 – 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 GWR009.
- 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 GWR009, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.

- e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the draft site guidelines for proposed allocation GWR009.

Questions: Site Allocation KCK009 – Land north of Church Lane, Knockin

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north of the village of Knockin. It is bounded by agricultural fields to the north, east and west, with residential dwellings to the south. Access to the site is from the adjacent development on Bradford Drive, which was an allocation under the adopted Shropshire Local Plan with site reference KK001.
- 1.2. To inform the identification of proposed site allocations, including KCK009, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 3 of the additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was

potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 9 sites were considered at Knockin. Within Stage 3 of the site assessment process, around 4 sites were considered at Knockin.

- 1.11. KCK009 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and KCK009 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to the site assessment process undertaken to identify proposed allocation KCK009 and the proposed allocation itself. These objections included:
 - a. Concern the proposed allocation floods as it is lower than the nearby Weirbrook, which is buffered, and as such is unsuitable for development. The last major event in 2014, but the site annually floods along its eastern aspect in proximity to Weirbrook. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of flood risk informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39). This site assessment process fully justifies the identification of this site as a proposed allocation.
 - b. Concerned drainage in the area will be compromised by development of the site, so it is unsuitable for development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment, which included consideration of flood risk informed by a two stage Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39). This site assessment process fully justifies the identification of this site as a proposed allocation.
 - c. Sewage treatment is already over-subscribed in the reedbed plant north end of church lane. Shropshire Council considers the site assessment process gave appropriate consideration to infrastructure constraints and opportunities. This site assessment process fully justifies the identification of this site as a proposed allocation.
- 1.14. In conclusion, Shropshire Council considers that KCK009 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable

options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. KCK009 is proposed to be allocated for residential development. This site is some 0.91ha in size and the approximate site provision figure is some 25 dwellings alongside an appropriate level of open space and landscaping.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The development will deliver an appropriate mix of housing. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation KCK009.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site. It

understands that a planning application is expected to be prepared in the first half of 2025.

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

Shropshire Council Response:

- 5.1. KCK009 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of KCK009 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Knockin and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines and in the site assessments. This includes the provision of new green infrastructure (incorporating existing mature trees on the site); and retention, buffering and enhancement of the public rights of way through the site.
- 5.5. More generally, it is also considered that development of KCK009 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing KCK009 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 KCK009.

- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that v constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for KCK009 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. Proximity to the Knockin Conservation Area (as the site lies adjacent to its boundary). Site guidelines require a proportionate Heritage Impact Assessment to be carried out and its recommendations implemented.
 - b. The site eastern boundary is part of an Environmental Network corridor. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - c. A small component of the site is located in a surface water flood risk zone. Site guidelines stipulate the development will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.

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

Shropshire Council Response:

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

Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.

- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation KCK009.
- 7.4. With specific regard to flood risk at KCK009, in summary:
 - a. With regard to fluvial flood risk, around 96% proposed allocation KCK009 is located within Flood Zone 1, the area with the lowest risk of flooding. Due to the presence of a watercourse on the sites eastern boundary, around 4% lies in Flood Zone 2 and around 3% lies in Flood Zone 3 (these are areas of higher flood risk and overlap).
 - b. With regard to other sources of flood risk, none of proposed allocation KCK009 is located within the 30 or 100 year surface flood risk zones. Around 1% of proposed allocation KCK009 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for KCK009 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including KCK009. It concluded that the site KCK009 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of KCK009 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 KCK009.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that KCK009 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for KCK009 within Schedule S1.1(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Access being dependent on the adjacent development. However, this development is complete with its design and layout provide suitable access to KCK009.
 - b. Existing mature trees on the site should be maintained. The public rights of way though the site should be retained, buffered and appropriately enhanced.
 - c. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable

development of KCK009. 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 KCK009 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 19 consultation response (A0394), the promoter of KCK009 stated states: *"KCK009 is deliverable,"* it also states *"Bidwells on behalf of Bradford Estates has held pre-application discussions with Shropshire Council under reference PREAPP/19/00137 and we are keen to facilitate delivery as soon as the planning process allows it."*

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 KCK009 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2029/30. The Council also anticipates that development will progress at a rate of up to 15 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are cautious and deliverable. However, the Council acknowledges that the site promoter anticipates that development will occur earlier in the plan period.
- 10.4. The Council would note that the promoter of the KCK009 component of the site specified within their Regulation 19 Representation (A0394) that "*KCK009 is deliverable.*" It is anticipated that KCK009 will be developed early in the development plan, given that the promoter confirmed discussions with the council regarding a pre-app on site.

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 KCK009 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 KCK009.
- 11.3. The boundary for KCK009 is defined by agricultural fields to the north, east and west, with residential dwellings to the south. Access to the site is from the adjacent development on Bradford Drive, which was an allocation under the adopted Shropshire Local Plan with site reference KK001.

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 KCK009 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of KCK009; 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 KCK009.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of KCK009 – 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 KCK009.
- 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 KCK009, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing

- requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is not aware that representations during the Regulation 19 Pre-Submission Consultation included any specific comment on the site guidelines proposed for KCK009.

Questions: Site Allocation LYH007 – Land east of Barley Meadows, Llanymynech

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north-east of the village of Llanymynech, consisting of an agricultural field. It is bounded by the Montgomery Canal to the north-west, residential development to the south-west, trees to the south-east and north.
- 1.2. To inform the identification of proposed site allocations, including LYH007, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 3 of the additional Sustainability Appraisal (GC44).

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

for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.

- 1.10. Within Stages 2a and 2b of the site assessment process, around 7 sites were considered at Llanymynech. Within Stage 3 of the site assessment process, 1 site was considered at Llanymynech.
- 1.11. LYH007 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and LYH007 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is not aware that any representations during the Regulation 19 Pre-Submission Consultation included specific objection to the site assessment process undertaken to identify proposed allocation LYH007.
- 1.14. In conclusion, Shropshire Council considers that LYH007 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. LYH007 is proposed to be allocated for residential development. This site is some 1.85ha in size and the approximate site provision figure is some 50 dwellings alongside an appropriate level of open space and landscaping.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation LYH007.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site. Shropshire Council understands the site promoter is intending to submit a planning application for the site in the first half of 2025.

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

Shropshire Council Response:

- 5.1. LYH007 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of LYH007 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Llanymynech and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.

- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. This includes the ability to retain and enhance the public right of way on the site; enhance footpaths to the nearby recreation space, village hall and village centre; and provision of green infrastructure.
- 5.5. More generally, it is also considered that development of LYH007 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing LYH007 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 LYH007.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LYH007 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for LYH007 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The site lies adjacent to the Llanymynech Conservation Area. To mitigate any impacts, the site guidelines specify a proportionate Heritage Impact Assessment should be carried out and its recommendations taken into account.
 - b. Surface water flood risk on a small component of the site. Site guidelines stipulate the site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, these areas will form part of the Green Infrastructure network.

Flood and water management measures must not displace water elsewhere.

- c. The sites boundaries are part of an Environmental Network corridor. Site guidelines require suitable buffers to hedgerows and watercourses on and adjacent to the site and protection of the canal corridor. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - d. Potential recreation impact on Montgomery Canal SAC. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from increased recreational pressure arising from development in Llanymynech on the integrity of Montgomery Canal SAC in accordance with Polices DP12, DP14 and DP15.
 - e. Proximity to the canal corridor. Site guidelines stipulate development should not adversely affect the canal corridor in terms of its structural integrity, landscape, heritage, ecological quality and character. They also specify any development should respond positively to the adjacent canal corridor and seek to optimise the benefits such a location can provide for local communities.
 - f. There is a culvert under the canal in proximity to the site. Site guidelines specify any development will need to demonstrate that no discharges from the site during or post-construction will adversely affect this culvert.
- 6.5. Additionally, mitigation measures will be required to remove any adverse effect from increased recreational pressure and water quality and quantity arising from development in Llanymynech on the integrity of the Montgomery Canal SAC in accordance with Polices DP12, DP14 and DP15.

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

Shropshire Council Response:

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

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

- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation LYH007.
- 7.4. A canal forms the north-western boundary of the site and there is a small drainage channel on the south west component. With specific regard to flood risk at LYH007, in summary:
 - a. With regard to fluvial flood risk, proposed allocation LYH007 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 1% of proposed allocation LYH007 is located within the 30 and 100 year surface flood risk zones and around 2% of proposed allocation LYH007 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for LYH007 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including LYH007. It concluded that the site LYH007 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of LYH007 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 LYH007.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LYH007 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for LYH007 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. A suitable buffer is required to hedgerows and watercourses on and adjacent to the site.
 - b. The public right of way on the site will be retained and enhanced. Development must also enhance footpaths to the nearby recreation space, village hall and village centre.
 - c. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
 - d. An appropriate access is already available at Barley Meadows.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.

- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of LYH007. 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 LYH007 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0357), the promoter of LYH007 stated that *"LYH007 is deliverable"* and *"...to demonstrate deliverability of the allocation in accordance with the above policy requirements, we have engaged in pre-application discussions with Shropshire Council under reference PREAPP/20/00355 on behalf of Bradford Estates for the residential development of the site in accordance with the LYH007 policy requirements."*

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 LYH007 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2028/29. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. The Council would note that the promoter of the LYH007 component of the site specified within their Regulation 19 Representation (A0394) that *"LYH007 is deliverable."* It is anticipated that LYH007 will be developed early in the development plan, given that the promoter confirmed discussions with the council regarding a pre-app on site.

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 LYH007 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 LYH007.
- 11.3. The boundary for LYH007 is defined by the Montgomery Canal to the north-west, residential development to the south-west, trees to the south-east and north.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for LYH007 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of LYH007; 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 LYH007.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of LYH007 – 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 LYH007.
- 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 LYH007, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included comments on proposed site guidelines for LYH007.
- 12.9. The main comment was a recommendation that they include more specific guidance relating to the design, scale and layout of the proposed allocation, to ensure that the development is comparable to the recent development of site LLAN009. Shropshire Council has proposed a main modification (within document GC4m) to the relevant site guideline for site LYH007 in Schedule 14.2(i) of draft Policy S14.2 to reflect the need for the design of development to be based on the result of the Heritage Impact Assessment and to include a buffer to the canal.

Questions: Site Allocation PYC021 – Land east of A483, Pant

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north of the village of Pant. It consists of an agricultural field and is bounded by the A483 to the west, residential dwellings to the south, undesignated trees to the east and a continuation of the agricultural field to the north.
- 1.2. To inform the identification of proposed site allocations, including PYC021, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).

- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix 3 of the additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 20 sites were considered at Pant. Within Stage 3 of the site assessment process, around 7 sites were considered at Pant.
- 1.11. PYC021 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and PYC021 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the site assessment process undertaken to identify proposed allocation PYC021.
- 1.14. In conclusion, Shropshire Council considers that PYC021 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. PYC021 is proposed to be allocated for residential development. This site is some 1.08ha in size and the approximate site provision figure is some 25 dwellings.

- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PYC021.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. PYC021 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of

PYC021 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Pant and Shropshire.

- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines.
- 5.5. These include:
 - a. Improvements to be made to the local and strategic road network where necessary.
 - b. A parking solution for the nearby village shop to the southern element of the site.
 - c. Funding for a suitable new vehicular access onto the A483 as well as extension to the local speed limits and any further necessary traffic calming.
 - d. Support for the delivery of a new footpath on eastern side of A483 along the site frontage alongside a suitable pedestrian crossing facility.
- 5.6. More generally, it is also considered that development of PYC021 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing PYC021 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 PYC021.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PYC021 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.

- 6.3. The draft site guidelines for PYC021 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. Proximity to a Local Wildlife Site and Environment Network. Site guidelines stipulate these assets will need to be appropriately buffered and protected from damage.
 - b. Potential recreation impact on Montgomery Canal SAC. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from increased recreational pressure arising from development in Pant on the integrity of Montgomery Canal SAC in accordance with Policies DP12, DP14 and DP15.
 - c. Small components of the site are subject to surface water flood risk. Site guidelines stipulate the site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
 - d. Nearby sources of noise and contamination to the land – roads and quarrying. Draft Policy DP18 establishes specific expectations to appropriately manage noise and contaminated land concerns.
- 6.5. Additionally, Mitigation measures will be required to remove any adverse effect from increased recreational pressure and water quality and quantity arising from development in Pant on the integrity of the Montgomery Canal SAC in accordance with Policies DP12, DP14 and DP15.

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

Shropshire Council Response:

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

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

- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation PYC021.
- 7.4. With specific regard to flood risk at PYC021, in summary:
 - a. With regard to fluvial flood risk, proposed allocation PYC021 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 4% of proposed allocation PYC021 is located within the 30-year surface flood risk zone, around 7% in the 100-year surface flood risk zone and around 20% of proposed allocation PYC021 is located within the 1,000-year surface flood risk zone.
- 7.5. The proposed site guidelines for PYC021 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including PYC021. It concluded that the site PYC021 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of PYC021 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 PYC021.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that PYC021 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for PYC021 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Development on the site to include a parking solution for the nearby village shop to the southern element of the site.
 - b. Subject to appropriate vehicular access being demonstrated. Any necessary improvements to the local and strategic road network will also be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - c. Development will fund a suitable new vehicular access onto the A483 as well as extension to the local speed limits and any further necessary traffic calming. No access will be available from Penyarreg Lane due to its constraints.
 - d. Development to support the delivery of a new footpath on eastern side of A483 along the site frontage alongside a suitable pedestrian crossing facility.

- e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
 - f. The nearby Local Wildlife Site and Environment Network (to the east) will need to be appropriately buffered and protected from damage.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of PYC021. 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 PYC021 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note

(GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).

- 9.3. Shropshire Council would also note that within their Regulation 18 consultation response, the promoter of PYC021 stated "We can confirm that this site is viable." It also states, "We can confirm this is a fully deliverable site with an area of 1.91ha." and "Our client is happy to cooperate with the council to ensure there is appropriate access and measures to provide a parking solution for the village shop, and a new footpath on the eastern side of A483 along the site frontage alongside a suitable pedestrian crossing facility. The site has already had interest from a number of builders both local and regional who are interested in developing the site." This can be found Appendix 10 of the Viability and Deliverability of Proposed Allocations Topic Paper (EV113).

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation PYC021 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2030/31 and continue until 2031/32. The Council also anticipates that development will progress at a rate of up to 15 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation PYC021 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 PYC021.

- 11.3. The boundary for PYC021 is defined by the A483 to the west, residential dwellings to the south, undesignated trees to the east and a continuation of the agricultural field to the north.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for PYC021 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of PYC021; 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 PYC021.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of PYC021 – 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 PYC021.
- 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 PYC021, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:

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

12.8. Shropshire Council is not aware that representations during the Regulation 19 Pre-Submission Consultation included specific comments on the proposed site guidelines for PYC021.

Questions: Site Allocation RUY019 – Former Dairy Site, School Road, Ruyton XI Towns

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the centre/west of the village of Ruyton XI Towns. The site is currently for industrial use and is surrounded by School Road to the east, residential development to the north and south and agricultural fields to the west.
- 1.2. To inform the identification of proposed site allocations, including RUY019, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).

- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).

- d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 22 sites were considered at Ruyton XI Towns. Within Stage 3 of the site assessment process, around 13 sites were considered at Ruyton XI Towns.
- 1.11. RUY019 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and RUY019 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that a representation during the Regulation 19 Pre-Submission Consultation included an objection to the site assessment process undertaken to identify proposed allocation RUY019.
- 1.14. Specifically, the objection specified that there appears little evidence that proposed allocation RUY019 will be released for development in the near future, as it is currently used as a haulage site.
- 1.15. Shropshire Council considers the proposed allocation is informed by a proportionate and robust site assessment. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of RUY019 as a proposed allocation.
- 1.16. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0490), the promoter of RUY019 stated *"We consider the site to be viable and deliverable having regard to the policy requirements of the Regulation 19 Local Plan: subject to the concerns we have raised, in particular in relation to policy DP1 and our observations above in relation to density, as the site might offer greater scope for more than 65 dwellings."* Site promoters subsequent correspondence stated: *"I would confirm that the site is viable and deliverable."*

1.17. In conclusion, Shropshire Council considers that RUY019 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. RUY019 is proposed to be allocated for residential development. This site is some 2.26ha in size and the approximate site provision figure is some 65 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation RUY019.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.
- 4.2. There have been several planning applications granted on this site for residential development since 1997, with the following references: OS/97/09949/OUT, OS/98/10243/FUL, OS/98/10114/FUL and OS/05/13752/OUT.
- 4.3. Of these, OS/97/09949/OUT and OS/98/10114/FUL were withdrawn, OS/98/10243/FUL was refused and OS/05/13752/OUT was granted but ultimately not proceeded with. This outline consent was for 80 dwellings, of which 71 were apartments.

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

Shropshire Council Response:

- 5.1. RUY019 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of RUY019 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Ruyton XI Towns and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines and site assessments. This includes:
 - a. The funding of an estate road access onto School Road with pedestrian crossing facility.
 - b. The site located is within medieval historic core of Ruyton, so redevelopment of the site for housing could aim to reinstate the

historic grain of the settlement and enhance its character through careful design.

- c. Betterments to residential amenity of those living around the existing commercial land use on site.

- 5.5. More generally, it is also considered that development of RUY019 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing RUY019 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 RUY019.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that RUY019 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for RUY019 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. The site is in proximity and contains heritage assets. Site guidelines require masterplanning to achieve a high-quality design and layout and there is potential for interpretation of heritage features on the site through this process. Any adverse effect on any heritage features are expected to be mitigated through this process. Site guidelines also stipulate that contributions to wider heritage features elsewhere in the settlement may also be appropriate (especially Ruyton Castle Scheduled Monument). Furthermore, draft Policy DP23 ensures the conservation and enhancement of heritage assets in Shropshire.
 - b. Potential impact on Sweet Mere and Cole Mere Ramsar sites. The draft Shropshire Local Plan is informed by a Habitats Regulations

Assessment (HRA). This informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from increased recreational pressure arising from development in Ruyton XI Towns on the integrity of the Cole Mere Ramsar site in accordance with Policies DP12, DP14 and DP15.

- c. Road to east is a source of noise. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- d. Significant commercial activities on site, as such there is likely contamination of land associated with this. Draft Policy DP18 establishes specific expectations to appropriately manage contaminated land concerns.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation RUY019.
- 7.4. With specific regard to flood risk at RUY019, in summary:
 - a. With regard to fluvial flood risk, proposed allocation RUY019 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, none of the proposed allocation RUY019 is located within the 30 or 100 year surface flood risk zones and around 2% is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for RUY019 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk*

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

- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including RUY019. It concluded that the site RUY019 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which ‘trigger’ the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of RUY019 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 RUY019.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that RUY019 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for RUY019 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 8.5. The site guidelines and site assessments include:
- a. Development will fund an estate road access onto School Road with pedestrian crossing facility.
 - b. There is potential for a new roundabout junction linking to Doctors Meadow, as well as betterments to residential amenity of those living around the existing commercial land use on site.
 - c. The design and layout of development and appropriate boundary treatments should mitigate noise from the road to the east of the site.
 - d. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of RUY019. 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 RUY019 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0490), the promoter of RUY019 stated *"We consider the site to be viable and deliverable having regard to the policy requirements of the Regulation 19 Local Plan: subject to the concerns we have raised, in particularly in relation to policy DP1 and our observations above in relation to density, as the site might offer greater scope for more than 65 dwellings."* Site promoters subsequent correspondence stated: *"I would confirm that the site is viable 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 RUY019 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2030/31. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0490), the promoter of RUY019 stated *"We consider the site to be viable and deliverable having regard to the policy requirements of the Regulation 19 Local Plan: subject to the concerns we have raised, in particularly in relation to policy DP1 and our observations above in relation to density, as the site might offer greater scope for more than 65 dwellings."*

10.5. Site promoters subsequent correspondence stated: *"I would confirm that the site is viable and deliverable."*

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation RUY019 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 RUY019.
- 11.3. The boundary for RUY019 is defined by School Road to the east, residential development to the north and south and agricultural fields to the west.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for RUY019 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of RUY019; 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 RUY019.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of RUY019– 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 RUY019.
- 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 RUY019, 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 an objection and some neutral comments to specific site guidelines proposed for RUY019. Dealing with these in turn:
- a. The site guidelines identifies potential for interpretation of heritage features on the site and also potentially contributions to wider heritage features elsewhere in the settlement (e.g. Ruyton Castle Scheduled Monument), but there are no known features on the site and it is some distance from the Castle, so this is unreasonable. Shropshire Council considers that these guidelines are appropriate and have been informed by a proportionate and robust site assessment process.

- b. More dwellings could be included in the site guideline for the allocation. Shropshire Council considers the proposed capacity is appropriate and suitable flexibility is provided within draft Policy S14.2 which recognises site provision figures are 'approximate'. Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.

Questions: Site Allocation SMH031 – Land east of Moors Bank, St Martins

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the south-west of the village of St Martins. It consists of two agricultural fields and is bounded by the B5069 line to the north, residential dwellings to the east and west and agricultural fields to the south.
- 1.2. To inform the identification of proposed site allocations, including SMH031, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal

and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 32 sites were considered at St Martins. Within Stage 3 of the site assessment process, around 18 sites were considered at St Martins.
- 1.11. SMH031 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.

- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SMH031 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that a representation during the Regulation 19 Pre-Submission Consultation included an objection to the site assessment process undertaken to identify proposed allocation SMH031.
- 1.14. Specifically, objection to the smaller field directly behind the rear gardens of 1-14 Moors Bank being included in the plans for SMH031. This has amenity value (residents have for many years used this field for recreational walking, to access public right of way and to walk to the canal) and is required for residents access to their gardens. Furthermore, if developed, it will have a detrimental impact on quality of life of residents of these properties.
- 12.9. Shropshire Council considers that SMH031 was identified through a proportionate and robust site assessment process. Shropshire Council considers the proposed allocation is informed by a proportionate and robust site assessment. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of SMH031 as a proposed allocation.
- 1.15. In conclusion, Shropshire Council considers that SMH031 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. SMH031 is proposed to be allocated for residential development. This site is some 3.39ha in size and the approximate site provision figure is some 60 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SMH031.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. SMH031 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of SMH031 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both St Martins and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development

integrates into and complements the existing built form of the village.

- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. This includes the provision of pedestrian crossing of the B5069 and a short section of missing footway on the south side of the site along the B5069 from the site frontage to the Church Lane bus stop.
- 5.5. More generally, it is also considered that development of SMH031 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing SMH031 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 SMH031.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SMH031 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for SMH031 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. A small component of the site is located within a surface water flood risk zone. Site guidelines specify that the site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure

- network. Flood and water management measures must not displace water elsewhere.
- b. The site is crossed by a sewer. Site guidelines require an appropriate easement or diversion of this infrastructure.
 - c. Existing mature trees on the site. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - d. Road noise to northern boundary of the site. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
 - e. St Martins is within the setting of the Clwydian Range and Dee Valley National Landscape. Planning Policy: Wales 10 requires development in the setting of a National Landscape to take account of the special qualities of the designated area. This is reflected in the requirements of draft Policy S14.2.
 - f. Mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in St Martins on the integrity of the Cole Mere Ramsar site in accordance with Policies DP12, DP14 and DP15. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from increased recreational pressure arising from development in St Martins on the integrity of the Cole Mere Ramsar site in accordance with Policies DP12, DP14 and DP15.

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

Shropshire Council Response:

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

process is provided within the response to Question 1 regarding proposed allocation SMH031.

- 7.4. With specific regard to flood risk at SMH031, in summary:
 - a. With regard to fluvial flood risk, proposed allocation SMH031 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 1% of proposed allocation SMH031 is located within the 30-year surface flood risk zone, 2% in the 100-year surface flood risk zone and around 5% is located within the 1,000-year surface flood risk zone.
- 7.5. The proposed site guidelines for SMH031 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including SMH031. It concluded that the site SMH031 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of SMH031 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 SMH031.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that

SMH031 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.

- 8.3. The draft site guidelines for SMH031 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. An appropriate estate road junction onto the B5069 to be provided.
 - b. Development to also provide a pedestrian crossing of the B5069; and a short section of missing footway on the south side of the site along the B5069 from the site frontage to the Church Lane bus stop.
 - c. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
 - d. The site is crossed by a sewer, therefore protection measures in the form of an easement width or a diversion of the pipe would likely be required which may impact upon the housing density achievable on site. An assessment of the Sewage Pumping Station (SPS) would need to be undertaken to establish whether improvements are required.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SMH031. 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.
- 8.10. 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 SMH031 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 18 consultation response, the site promoter stated: *"The Estate considers a residential scheme, on the basis of the Reg18 SPD policy requirements, to be viable and deliverable. The Estate has experience of joint venture delivery in conjunction with a development partner and it is envisaged that a similar approach will be utilised in respect of SMH031. This provides a model which removes initial land cost and provides for greater flexibility in project delivery. The Estate is therefore confident that a delivery model tested in respect of SAMDev allocation SMH031 can be replicated."*

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 SMH031 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/29 and continue until 2030/31. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would also note that within their Regulation 18 consultation response, the site promoter stated: *"The Estate considers a residential scheme, on the basis of the Reg18 SPD policy requirements, to be viable and deliverable. The Estate has experience of joint venture delivery in conjunction with a development partner and it is envisaged that a similar approach will be utilised in respect of SMH031. This provides a model which removes initial land cost and provides for greater flexibility in project delivery. The Estate is therefore confident that a delivery model tested in respect of SAMDev allocation SMH031 can be replicated."*

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 SMH031 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 SMH031.
- 11.3. The boundary for SMH031 is the B5069 line to the north, residential dwellings to the east and west and agricultural fields to the south.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for SMH031 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SMH031; 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 SMH031.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of SMH031 – 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 SMH031.
- 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 SMH031, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing

- requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included comments on specific site guidelines proposed for SMH031. These are summarised in SD014.03 and GC4o.
- 12.9. This included an expectation that site guidelines ensure the retention of the public right of way through the site. Shropshire Council is not aware of a public right of way through the site. Whilst a public right of way runs near the site, its nearest point is around 130m away.

Questions: Site Allocation SMH038 – Former Ifton Heath Primary School, St Martins

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north of the village of St Martins. It consisted of an old, discontinued school (last in use circa 2013) and was a site for travelling show people. It is bounded by Overton Road to the east, and hedgerow boundaries to the north, south and west.
- 1.2. To inform the identification of proposed site allocations, including SMH038, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).

- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).

- d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
 - 1.10. Within Stages 2a and 2b of the site assessment process, around 32 sites were considered at St Martins. Within Stage 3 of the site assessment process, around 18 sites were considered at St Martins.
 - 1.11. SMH038 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
 - 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and SMH038 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
 - 1.13. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included significant objection to the site assessment process undertaken to identify proposed allocation SMH038.
 - 1.14. In conclusion, Shropshire Council considers that SMH038 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. SMH038 is proposed to be allocated for residential development. This site is some 1.49ha in size and the approximate site provision figure is some 35 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.

- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SMH038.
- 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. The site was subject to a planning application for 35 dwellings (reference 20/02248/FUL) granted on 5th November 2021. Works commenced on this development in March 2022 and it is understood that most of the dwellings are now complete.

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

Shropshire Council Response:

- 5.1. SMH038 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of SMH038 and the wider draft policies in the draft Shropshire Local

Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both St Martins and Shropshire.

- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
 - a. Development to fund an appropriate estate road junction onto Overton Road.
 - b. An assessment of whether the playing field on the site is surplus to requirements must be undertaken. If this concludes the open space is not surplus, then equivalent or better provision in terms of quantity and quality in a suitable location will occur.
- 5.5. More generally, it is also considered that development of SMH038 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing SMH038 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 SMH038.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SMH038 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for SMH038 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The site is occupied by a travelling showperson family. Site guidelines state development will only occur following appropriate relocation of existing site occupants. This was carried out several years ago, when the family moved to Oswestry prior to the commencement of development of the site.
 - b. St Martins is within the setting of the Clwydian Range and Dee Valley National Landscape. Planning Policy: Wales 10 requires development in the setting of a National Landscape to take account of the special qualities of the designated area. This is reflected in the requirements of draft Policy S14.2.
 - c. Mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in St Martins on the integrity of the Cole Mere Ramsar site in accordance with Policies DP12, DP14 and DP15. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from increased recreational pressure arising from development in St Martins on the integrity of the Cole Mere Ramsar site in accordance with Policies DP12, DP14 and DP15.
 - d. Noise associated with a road to the east of the site. Site guidelines require the design and layout of development and appropriate boundary treatments to mitigate noise from this source.
 - e. Potential loss of open space. Site guidelines require an assessment of whether the playing field on the site is surplus to requirements must be undertaken. If this concludes the open space is not surplus, then equivalent or better provision in terms of quantity and quality in a suitable location will occur.
 - f. The site contains historic school buildings. Site guidelines require consideration of Opportunities for their retention and conversion.
 - g. A small component of the site is located in a surface flood risk zone. Site guidelines require the site to incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
 - h. The site contains mature trees. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

- i. There is existing built form on the site, therefore potential for associated contamination. Draft Policy DP18 establishes specific expectations to appropriately manage contaminated land concerns.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation SMH038.
- 7.4. With specific regard to flood risk at SMH038, in summary:
 - a. With regard to fluvial flood risk, proposed allocation SMH038 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, none of the site lies within the 30-year surface flood risk zone, around 1% is located within the 100-year surface flood risk zones and around 2% of proposed allocation SMH038 is located within the 1,000-year surface flood risk zone.
- 7.5. The proposed site guidelines for SMH038 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test

Assessment (EV094), which gave consideration to all proposed allocations including SMH038. It concluded that the site SMH038 passed the sequential test and that there is no requirement for the exception test.

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

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of SMH038 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 SMH038.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that SMH038 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for SMH038 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Development to fund an appropriate estate road junction onto Overton Road.
 - b. An assessment of whether the playing field on the site is surplus to requirements must be undertaken. If this concludes the open

- space is not surplus, then equivalent or better provision in terms of quantity and quality in a suitable location will occur.
- c. Provision of a suitable water supply and foul-water disposal which will not adversely affect the River Dee SAC must be demonstrated via HRA for this site to be developed.
 - d. The design and layout of development and appropriate boundary treatments should mitigate noise from the road to the east of the site.
 - e. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of SMH038. 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 SMH038 is realistically viable and deliverable. This is evident given that the majority of the site is now complete and occupied, under planning permission 20/02248/FUL (with commencement taking place in early-2022).
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation SMH038 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. Shropshire Council understands that this site is now fully complete and occupied.

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 SMH038 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 SMH038.
- 11.3. The boundary for SMH038 is bounded by Overton Road to the east, and hedgerow boundaries to the north, south and west.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for SMH038 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of SMH038; 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 SMH038.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of SMH038 – 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 SMH038.
- 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 SMH038, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

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

12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included objections to the draft site guidelines proposed for allocation SMH038.

Questions: Site Allocation WEF025 – Land at West Felton

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the south-east of the village of West Felton. It is bounded by residential development to the west and north, Oak Farm Lane to the east and a continuation of the field to the south.
- 1.2. To inform the identification of proposed site allocations, including WEF025, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.

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

- 1.10. Within Stages 2a and 2b of the site assessment process, around 27 sites were considered at West Felton. Within Stage 3 of the site assessment process, around 19 sites were considered at West Felton.
- 1.11. WEF025 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WEF025 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that a representation during the Regulation 19 Pre-Submission Consultation included objection to the site assessment process undertaken to identify proposed allocation WEF025.
- 1.14. Specifically that the Stage 2a site assessment indicates that objectively there were more sustainable sites they could have chosen. Shropshire Council considers the conclusions of Stage 2a of the site assessment process were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.
- 1.15. In conclusion, Shropshire Council considers that WEF025 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. WEF025 is proposed to be allocated for residential development. This site is some 2.01ha in size and the approximate site provision figure is some 60 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft

policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEF025.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. WEF025 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WEF025 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both West Felton and Shropshire.

- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines.
- 5.5. These include the requirement for development to secure extended formal and permanent recreation ground on adjacent land in the same ownership.
- 5.6. More generally, it is also considered that development of WEF025 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing WEF025 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 WEF025.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEF025 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WEF025 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. There are a number of TPOs in the western boundary. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - b. Potential for an adverse effect on the integrity of the White Mere and Cole Mere. The draft Shropshire Local Plan is informed by a

Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.2. These include measures to remove any adverse effect from increased recreational pressure arising from development in West Felton on the integrity of the Cole Mere Ramsar site in accordance with Policies DP12, DP14 and DP15.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WEF025.
- 7.4. With specific regard to flood risk at WEF025, in summary:
 - a. With regard to fluvial flood risk, proposed allocation WEF025 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, none of the proposed allocation lies within the 30, 100 or 1,000-year surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WEF025. It concluded that the site WEF025 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger'

the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WEF025 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 WEF025.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WEF025 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WEF025 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Access to be provided via the adjacent development site or Tedsmore Road.
 - b. Access onto Tedsmore Road would require widening of the road and footway provision along the site frontage as far as the Methodist Church. The existing 30mph speed limit would also need to be reviewed and appropriate traffic calming provided.
 - c. Development to secure extended formal and permanent recreation ground on adjacent land in the same ownership.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.

- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WEF025. 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 WEF025 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, following the Regulation 19 consultation, the promoter of WEF025 stated *"I can confirm the site is viable and deliverable,"* and *"the timescales in Appendix 7 are correct."*

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 WEF025 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2028/2 and continue until 2030/31. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that, following the Regulation 19 consultation, the promoter of WEF025 stated "*I can confirm the site is viable and deliverable,*" and "*the timescales in Appendix 7 are correct.*"

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 WEF025 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 WEF025.
- 11.3. The boundary for WEF025 is defined residential development to the west and north, Oak Farm Lane to the east and a continuation of the field to the south.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WEF025 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WEF025; 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 WEF025.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WEF025 – 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 WEF025.
- 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 WEF025, 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 now aware of representations during the Regulation 19 Pre-Submission Consultation that included specific objection to the draft site guidelines for site WEF025. Representations are summarised in SD013.01 and GC4o.

Questions: Site Allocation WRP001VAR – Land west of Trehowell Lane, Weston Rhyn

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the north of the village of Weston Rhyn. It consists of three agricultural fields and is bounded by residential development to the south, Trehowell Lane to the east and agricultural fields to the north and west.
- 1.2. To inform the identification of proposed site allocations, including WRP001VAR, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.

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

- 1.10. Within Stages 2a and 2b of the site assessment process, around 27 sites were considered at Weston Rhyn. Within Stage 3 of the site assessment process, around 8 sites were considered at Weston Rhyn.
- 1.11. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). Initially, this site only comprised of the eastern element, under reference WRP001. This was the preferred site under the Regulation 18 Preferred Sites Consultation (2018). However, prior to the second Regulation 18 consultation (Pre-Submission Draft – August 2020), Shropshire Council noted that this site promotion was fairly historic (circa 2007) and, despite efforts, could not contact the site promoter for clarification. In light of this, and that it was unclear as to whether the site was indeed available, Shropshire Council selected the adjacent site (ref WRP006) in place of WRP001 under the 2020 Regulation 19 consultation utilising the site assessment process.
- 1.12. Following this, the site promoter for WRP001 contacted Shropshire Council to confirm that the site was indeed available. Discussions took place between Shropshire Council and the promoters of both WRP001 and WRP006 whereby it was confirmed that a hybrid site would be the preferred allocation going forward, utilising WRP001 in its entirety (as it was the preferred site in the first instance under the first Regulation 18 consultation) as well as the eastern portion of WRP006.
- 1.13. This approach was seen as appropriate given the concerns raised by the Parish Council over WRP006 as the possible congestion issues that this would cause towards the roundabout on High Street. Further, combining the majority of these two sites (now with ref WRP001VAR) will include the repositioning of Trehowell Lane for an appropriate access, and development of this allocation will unlock sites to its immediate north, east and west for future development, thus sustaining Weston Rhyn's growth going forwards.
- 1.14. WRP001VAR was subsequently subject to the Regulation 19 Pre-Submission Consultation and was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the site assessment process undertaken to identify proposed allocation WRP001VAR.
- 1.16. In conclusion, Shropshire Council considers that WRP001VAR was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process

undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. WRP001VAR is proposed to be allocated for residential development. This site is some 3.84ha in size and the approximate site provision figure is some 60 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WRP001VAR.
- 3.2. It has also been informed by Regulation 1 Pre-Submission consultation and proactive engagement with the site promoters outlined in paras 1.12-1.14 above.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. WRP001VAR is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WRP001VAR and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Weston Rhyn and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include the site's layout making provision for any future development to the west and north.
- 5.5. More generally, it is also considered that development WRP001VAR will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing WRP001VAR 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 WRP001VAR.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WRP001VAR constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.

- 6.3. The draft site guidelines for WRP001VAR within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The site is in proximity of a Grade II listed Sunday School. Site guidelines stipulate that development will need to be sympathetic to this asset. Furthermore, draft Policy DP23 ensures the conservation and enhancement of heritage assets in Shropshire.
 - b. Agricultural land with significant field and boundary trees and hedgerows. Site guidelines stipulate these trees should be retained.
 - c. A small component of the site is located in the surface flood risk zone. Site guidelines require development to incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
 - d. Possible road noise to the south and east. Site guidelines require the design and layout of development and appropriate boundary treatments to mitigate noise from these sources.
 - e. Weston Rhyn is within the setting of the Clwydian Range and Dee Valley National Landscape. Planning Policy: Wales 10 requires development in the setting of a National Landscape to take account of the special qualities of the designated area. This is reflected in the requirements of draft Policy S14.2.
 - f. Mitigation measures will be required to remove any adverse effect on water quality and quantity arising from development in Weston Rhyn on the integrity of the River Dee SAC in accordance with Policies DP12, DP14 and DP15. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from development in Weston Rhyn on the integrity of the River Dee SAC in accordance with Policies DP12, DP14 and DP15.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WRP001VAR.
- 7.4. With specific regard to flood risk at WRP001VAR, in summary:
 - a. With regard to fluvial flood risk, proposed allocation WRP001VAR is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, none of the proposed allocation WRP001VAR is located within the 30- or 100-year surface flood risk zones and around 1% of proposed allocation is located within the 1,000-year surface flood risk zone.
- 7.5. The proposed site guidelines for WRP001VAR within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WRP001VAR. It concluded that the site WRP001VAR passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of

the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WRP001VAR 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 WRP001VAR.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WRP001VAR constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WRP001VAR within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. Development must include appropriate repositioning of Trehowell Lane to access the site, including utilising the land to the east of the road (which is under the same ownership as the preferred site). This road would need appropriate widening with a new junction being formed.
 - b. The design and layout of development and appropriate boundary treatments should mitigate noise from the road to the west of the site.
 - c. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from

the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.

- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WRP001VAR. 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 WRP001VAR 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 correspondence appended to EV113 from the promoters of both elements of this preferred allocation stated in relation to the viability and deliverability that:

a. Site promoters (1) correspondence states:

"• The owner of site WRP001 wishes to dispose of the site as quickly as possible. I understand that the owners of site WRP006 are of the same mind.

• There is a local developer who is in discussion regarding the purchase of the 2 parcels of the land and wishes to bring the site forward as soon as possible.

• The site is free from constraints and is viable."

b. Site promoters (2) correspondence states:

"•...It appears, then, that the land is both viable and deliverable within the period of the Local Plan Review."

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 WRP001VAR are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).

10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2028/29. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.

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

10.4. The Council would note that correspondence appended to the Viability Topic Paper (EV113) from the promoters of both elements of this preferred allocation stated in relation to the viability and deliverability that:

a. Site promoters (1) correspondence states:

"• It is anticipated that the application would be submitted following adoption in 2022 with development commencing in 2023/2024, so the development would commence in the 'short term'. I would

anticipate that it would be completed in the 2025/26 to 2029/30 'medium term' period."

b. Site promoters (2) correspondence states:

"•.....it is anticipated that development would commence within the period you have referred to as "short term" in your e-mail of 17 November and that completion of the development would fall into the "medium term" you referred to."

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 WRP001VAR 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 WRP001VAR.
- 11.3. The boundary for WRP001VAR residential development to the south, Trehowell Lane to the east and agricultural fields to the north and west.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WRP001VAR within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WRP001VAR; 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 WRP001VAR.

- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WRP001VAR – 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 WRP001VAR.
- 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 WRP001VAR, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included objections

to the draft site guidelines proposed for WRP001VAR. A summary of these representation is below and in SD014.03 and GC4o.

Questions: Site Allocation WRP017 – Land off Station Road, Weston Rhyn

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the south of the village of Weston Rhyn. It consists of an agricultural field and an area of Open Space (Outdoor Sports - Weston Rhyn School Playing Field). It is bounded an agricultural field to the south, residential dwellings to the west, Station Road to the north and Old Chirk Road to the east.
- 1.2. To inform the identification of proposed site allocations, including WRP017, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability:* Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site

is available for relevant forms of development, despite best efforts to ascertain site availability.

- c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
 - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Oswestry Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 27 sites were considered at Weston Rhyn. Within Stage 3 of the site assessment process, around 8 sites were considered at Weston Rhyn.
- 1.11. WRP017 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WRP017 was identified as a proposed

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

1.13. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the site assessment process undertaken to identify proposed allocation WRP017.

1.14. In conclusion, Shropshire Council considers that WRP017 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. WRP017 is proposed to be allocated for residential development. This site is some 1.55ha in size and the approximate site provision figure is some 40 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WRP017.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

- 4.1. Shropshire Council continues to engage in positive dialogue with the site promoter in relation to future development of this site.

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

Shropshire Council Response:

- 5.1. WRP017 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WRP017 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Weston Rhyn and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
 - a. The existing school playing pitch will be relocated within the site to the east, parallel to Old Chirk Road. The existing playing pitch will be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
 - b. Provision of improved parking facilities for the school is required.
 - c. An appropriate footway is to be provided along the site frontage with Station Road and a pedestrian crossing facility to access school.

- 5.5. More generally, it is also considered that development of WRP017 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing WRP017 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 WRP017.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WRP017 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WRP017 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. There are mature trees on the site. Draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
 - b. Road noise to north. Site guidelines require the design and layout of development and appropriate boundary treatments should mitigate noise from this source.
 - c. St Martins is within the setting of the Clwydian Range and Dee Valley National Landscape. Planning Policy: Wales 10 requires development in the setting of a National Landscape to take account of the special qualities of the designated area. This is reflected in the requirements of draft Policy S14.2.
 - d. Mitigation measures will be required to remove any adverse effect on water quality and quantity arising from development in Weston Rhyn on the integrity of the River Dee SAC in accordance with Policies DP12, DP14 and DP15. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA), which informed the mitigation measures required in draft Policy

S14.2, to remove any adverse effect from development in Weston Rhyn on the integrity of the River Dee SAC in accordance with Policies DP12, DP14 and DP15.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WRP017.
- 7.4. With specific regard to flood risk at WRP017, in summary:
 - a. With regard to fluvial flood risk, proposed allocation WRP017 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, none of the proposed allocation WRP017 is located within the 30,100 or 1,000 year surface flood risk zones.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WRP017. It concluded that the site WRP017 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WRP017 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 WRP017.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WRP017 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WRP017 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
 - a. The existing school playing pitch will be relocated within the site to the east, parallel to Old Chirk Road. The existing playing pitch will be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
 - b. Provision of improved parking facilities for the school is required.
 - c. An appropriate footway is to be provided along the site frontage with Station Road and a pedestrian crossing facility to access school.
 - d. The design and layout of development and appropriate boundary treatments should mitigate noise from the road to the north of the site.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.

- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WRP017. 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 WRP017 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 correspondence with the site promoter in 2021 confirmed that:

"With regard to the sites listed below [including WRP017] I can confirm that further to the work undertaken to date that they remain very much viable and deliverable with regard to the policy requirements identified within the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan. We will continue to undertake further diligence work in this respect."

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 WRP017 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2027/28 and continue until 2028/29. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that correspondence with the site promoter in 2021 confirmed that: *"With regard to the sites listed below [including WRP017] I can confirm that further to the work undertaken to date that they remain very much viable and deliverable with regard to the policy requirements identified within the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan. We will continue to undertake further diligence work in this respect."*

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 WRP017 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 WRP017.
- 11.3. The boundary for WRP017 is defined by an agricultural field to the south, residential dwellings to the west, Station Road to the north and Old Chirk Road 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 WRP017 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WRP017; 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 WRP017.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WRP017 – 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 WRP017.
- 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 WRP017, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

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

12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the site guidelines proposed for WRP017. A summary of all representations can be found in SD014.03 and GC40.

Questions: Site Allocation WHN024 – Land off Donnett Close, Whittington

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

Shropshire Council Response:

- 1.1. This proposed allocation lies to the south-east of the village of Whittington. It consists of an agricultural field and is bounded a hedgerow to the south and east, the B5009 and Donnett Close to the west and a continuation of the agricultural field to the north.
- 1.2. To inform the identification of proposed site allocations, including WHN024, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.

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

- 1.10. Within Stages 2a and 2b of the site assessment process, around 27 sites were considered at Whittington. Within Stage 3 of the site assessment process, around 14 sites were considered at Whittington.
- 1.11. WHN024 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.12. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and WHN024 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the site assessment process undertaken to identify proposed allocation WHN024.
- 1.14. In conclusion, Shropshire Council considers that WHN024 was identified through a proportionate and robust site assessment process which effectively summarises the site assessment process undertaken and the conclusions reached; considered all reasonable options for site allocations; and was appropriately informed by consideration of relevant information.

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

Shropshire Council Response:

- 2.1. WHN024 is proposed to be allocated for residential development. This site is some 2.53ha in size and the approximate site provision figure is some 70 dwellings.
- 2.2. Detailed development guidelines within Schedule S14.2(i) of draft Policy S14.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S14.2(i) of draft Policy S14.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WHN024.
- 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. There is currently a planning application for the development of 61 dwellings on this site, with reference 24/02260/FUL. This application is currently pending consideration and was validated in June 2024.

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

Shropshire Council Response:

- 5.1. WHN024 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of WHN024 and the wider draft policies in the draft Shropshire Local Plan), development of the site would constitute sustainable development that contributes to the long-term sustainability of both Whittington and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.

- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines.
- 5.5. More generally, it is also considered that development of WHN024 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire.

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

Shropshire Council Response:

- 6.1. Potential adverse impacts of developing WHN024 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 WHN024.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHN024 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for WHN024 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
 - a. Site located partially within (i.e. site access), and may effect setting, of the Whittington Conservation Area. Site guidelines require a proportionate Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of development on the significance of the Whittington Conservation Area and its setting and the significance, including the setting, of any other heritage assets within proximity of the site.
 - b. A component of the site is located in a surface water flood risk zone. Site guidelines require development to incorporate appropriate sustainable drainage, informed by a sustainable

drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.

- c. Road noise close to the southwest part of the site. Site guidelines require the design and layout of development and appropriate boundary treatments to mitigate noise from this source.
- d. Mitigation measures will be required to remove any adverse effect arising from development in Weston Rhyn on the integrity of the Cole Mere, White Mere and Crose Mere. The draft Shropshire Local Plan is informed by a Habitats Regulations Assessment (HRA). This informed the mitigation measures required in draft Policy S14.2, to remove any adverse effect from increased recreational pressure arising from development in Whittington on the integrity of the Cole Mere in accordance with Policies DP12, DP14 and DP15.

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

Shropshire Council Response:

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation WHN024.
- 7.4. With specific regard to flood risk at WHN024, in summary:
 - a. With regard to fluvial flood risk, proposed allocation WHN024 is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
 - b. With regard to other sources of flood risk, around 2% of proposed allocation WHN024 is located within the 30- and 100-

year surface flood risk zones and around 6% of proposed allocation WHN024 is located within the 1,000-year surface flood risk zone.

- 7.5. The proposed site guidelines for WHN024 within Schedule S14.2(i) of draft Policy S14.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including WHN024. It concluded that the site WHN024 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of WHN024 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 WHN024.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that WHN024 constituted an appropriate proposed residential allocation; it was possible to achieve the sustainable development of the site; and that development of the site was viable and deliverable.
- 8.3. The draft site guidelines for WHN024 within Schedule S14.2(i) of draft Policy S14.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.

- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
- a. Appropriate access to be provided via the B5009.
 - b. Development will fund a review and extension of 30mph speed limit and any necessary traffic calming and footways and pedestrian crossing facilities at the site frontage.
 - c. The design and layout of development and appropriate boundary treatments should mitigate noise from the road to the west of the site.
 - d. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of WHN024. 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 WHN024 is realistically viable and deliverable. This is evident given that the site is currently subject to a planning application for 61 dwellings, with reference 24/02260/FUL.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0403), the promoter of WHN024 stated *We support the allocation of Site WHN024 (Land off Donnett Close, Whittington) in Place Plan S14 for the development of 70 dwellings. The site is deliverable and achievable within the first five years of the Local Plan Review period.* It also states *"Site WHN024 is viable and deliverable having regard to the policy requirements identified within the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan."*

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation WHN024 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2026/27 and continue until 2029/30. The Council also anticipates that development will progress at a rate of up to 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.

- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0403), the promoter of WHN024 stated *We support the allocation of Site WHN024 (Land off Donnett Close, Whittington) in Place Plan S14 for the development of 70 dwellings. The site is deliverable and achievable within the first five years of the Local Plan Review period.* It also states *"Site WHN024 is viable and deliverable having regard to the policy requirements identified within the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan."*
- 10.5. The Council would also note that this site is currently the subject of a Full Planning Application (24/02260/FUL).

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 WHN024 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 WHN024.
- 11.3. The boundary for WHN024 consists of a hedgerow to the south and east, the B5009 and Donnett Close to the west and a continuation of the agricultural field to the north.

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

Shropshire Council Response:

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for WHN024 within Schedule S14.2(i) of draft Policy S14.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of WHN024; 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 WHN024.
- 12.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 12.5. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.6. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of WHN024 – 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 WHN024.
- 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 WHN024, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.

f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.

12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included specific objections to the draft site guidelines proposed for WHN024. A summary of all representations can be found in SD014.03 and GC4o.