

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 19**



## **Matter 19 - Much Wenlock Place Plan Area (policy S13)**

***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 Much Wenlock Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Much Wenlock Place Plan area is established within draft settlement policies S13.1-S13.4, 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. A particular constraint at Much Wenlock is flood risk, with the settlement located within a Flood Rapid Response Catchment in the highest category. Surface water flooding can develop very quickly in this situation and the potential impact on flood risk is therefore a very significant local consideration, including in the manner in which development sites are identified and developed.
- 1.5. In positively responding to the characteristics, constraints and opportunities of the settlements in the Much Wenlock Place Plan area, the draft Shropshire Local Plan identifies Much Wenlock, Cressage and Buildwas as locations to accommodate development. Specifically:
  - a. Much Wenlock is proposed to be identified as a Key Centre where growth will respond to local needs and contribute towards achieving strategic growth objectives in the east of the County, consistent with the requirements of Policy S13.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Much Wenlock envisage the delivery

of around 200 dwellings and 2ha of employment land between 2016 and 2038.

- b. Cressage is a significant rural service centre, as such it is proposed to be identified as a Community Hub where new development will respond to local needs consistent with Policy S13.2, Policy SP8, and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Cressage envisage the delivery of around 80 dwellings between 2016 and 2038.
  - c. Buildwas is proposed to be identified as a Community Cluster where new development will respond to local needs, consistent with the requirements of Policy S8.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of these settlements, no specific development guidelines or allocations are proposed.
- 1.6. In identifying site allocations to contribute to the achievement of the strategies proposed for Much Wenlock and Cressage, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
  - 1.7. Through this process one proposed residential site allocation was identified at Much Wenlock (MUW012VAR) and two proposed residential site allocations were identified at Cressage (CES005 and CES006). This assessment work is summarised within Appendix N (SD006.15) of the of Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
  - 1.8. A 'made' Neighbourhood Plan exists for Much Wenlock, which addresses the period to 2026, in accordance with the adopted Development Plan. As such there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. Therefore, the draft Shropshire Local Plan provides a development strategy for the settlement and provides the mechanisms to achieve this strategy.
  - 1.9. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable. Importantly, the draft Shropshire Local Plan specifically recognises (at paragraph 5.179) the role of the Much Wenlock Neighbourhood Plan and within paragraph 7 of draft Policy S13.1 states that "*Development proposals will be expected to positively respond to policies and guidelines within the Much Wenlock Neighbourhood Plan, any other relevant community-led plans and any masterplans that are adopted by Shropshire Council*".

- 1.10. Shropshire Council is aware that a Neighbourhood Plan 'refresh' process has now commenced for Much Wenlock. This Neighbourhood Plan will align with the draft Shropshire Local Plan and support the achievement of the settlement strategy for the town, and the wider vision, objectives and strategy for Shropshire.
- 1.11. The Much Wenlock Place Plan area generally has a strong functional relationship to the Black Country, due to its geographic location and the presence of the M54/A5 strategic corridor, which runs from east-west through it. As a result, Much Wenlock was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.12. A robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options within the identified assessment geography – including Much Wenlock. However, due to the settlements characteristics and constraints, following assessment of all site options at the town, it was ultimately not considered a suitable location to accommodate such contributions. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 1.13. 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.
- 1.14. The Council considers the proposed approach to development in the Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan. In particular, it is responsive to the conclusions of:
  - a. Sustainability Appraisal and Site Assessment processes (SD006.01-SD006.22 and GC44).
  - b. The Hierarchy of Settlements (EV060).
  - c. Assessments of the characteristics of settlements, including the Market Town Profiles (most recent publications EV073.01-EV073.17).
  - d. Conclusions of infrastructure planning processes (most recent publication is GC54).
- 1.15. 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.

- 1.16. 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 MUW012VAR – Land adjoining the Primary School and Hunters Gate, Much Wenlock**

**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 Much Wenlock. It consists of two agricultural fields. It is bounded residential curtilages, the curtilage of Much Wenlock Primary School and Hunters Gate to the north, residential curtilages and agricultural field boundaries to the east, an agricultural field boundary to the south, and Bridgnorth Road to the west.
- 1.2. To inform the identification of proposed site allocations, including MUW012VAR, 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 7 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. For the avoidance of doubt, the stage 3 site assessment process included consideration of flood risk, informed by the Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39) and engagement with the Council's Drainage and Flood Risk Manager.
- 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 Much Wenlock 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 17 sites were considered at Much Wenlock. Within Stage 3 of the site assessment process, around 11 sites were considered at Much Wenlock.
- 1.12. Initially the allocation proposed for Much Wenlock was site MUW012, a 3.81ha site proposed for around 80 dwellings, which was subject to Regulation 18 Plan Making consultation (EV005.01).
- 1.13. Through this consultation and subsequent discussions with the site promoter, involving the Council's Drainage and Flood Risk Manager, it became apparent that in order to ensure the delivery of necessary flood alleviation both for the site itself and off-site at Hunters Gate and Forester Avenue, as a community benefit, it was necessary to expand the size and capacity of the site.
- 1.14. As such, the proposed allocation at Much Wenlock was amended to MUW012VAR, a 5.86ha site which consisted of the entirety of MUW012 plus a further additional agricultural field of some 2.05ha. The approximate site capacity was also increased to 120 dwellings.
- 1.15. In addition to the considerable community benefits associated with on and off site flood alleviation, this extension will also enhance the sites viability, thereby facilitating the highway infrastructure works required to make this development acceptable, which include a new roundabout on the A458.
- 1.16. This amended proposed allocation and associated proposed site guidelines were subsequently subject to and informed by Regulation 18 Plan-Making consultation (EV007.01).
- 1.17. They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and MUW012VAR was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.18. MUW012VAR has been proactively promoted for residential development during the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.19. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of MUW012VAR as proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
- a. The site assessment process is flawed, including because it lacks appropriate consideration of flood risk (including the principles of the sequential test). 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). It was also informed by specific engagement with the Council's Drainage and Flood Risk Manager. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation.
  - b. This and other sites at Much Wenlock are inappropriate for development due to flood risk:
    - i. The town is located in the highest category rapid response catchment, which will be exacerbated by climate change.
    - ii. Flood risk has not been adequately considered and the approach is inconsistent with national policy.
    - iii. Development of this site will increase flood risk elsewhere in the town, which is unacceptable.
    - iv. It is inappropriate to transfer responsibility for managing flood risk / rely on a developer to deliver flood risk management, particularly as there is no evidence such measures will be effective.

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). It was also informed by specific engagement with the Council's Drainage and Flood Risk Manager. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation. Development is considered an appropriate mechanism to facilitate delivery of infrastructure, including flood management infrastructure.

- c. There is insufficient justification of why MUW012VAR was proposed for allocation over other sites in more accessible



locations. Shropshire Council considers that the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies the identification of MUW012VAR as a proposed allocation.

- d. This allocation does not align with the 'made' Neighbourhood Plan for Much Wenlock. The draft Shropshire Local Plan is intended to work alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in line with the adopted Development Plan), there is a need for the Council to plan effectively for a further 12 years to the end of the proposed plan period to 2038. As such, the Shropshire Local Plan provides an appropriate development strategy for the town and identifies appropriate site allocations to support the achievement of this development strategy.
- e. Capacity can be achieved through windfall (primarily on brownfield sites), as such no allocation is required – this should have been considered as a realistic option. Shropshire Council considers that an appropriate and deliverable development strategy is proposed for Much Wenlock and that proposed allocation MUW012VAR represents a key component of this strategy. Identification of this proposed allocation was informed by a proportionate and robust site assessment, which included consideration of the characteristics and constraints present in Much Wenlock.
- f. The cumulative effects of development at Much Wenlock and nearby locations on the town (character and infrastructure) have not been adequately considered. Shropshire Council considers that an appropriate and deliverable development strategy is proposed for Much Wenlock and that proposed allocation MUW012VAR represents a key component of this strategy. Identification of this proposed allocation was informed by a proportionate and robust site assessment, which included consideration of the characteristics and constraints present in Much Wenlock.
- g. This site is not consistent with the requirements of the wider policies of the draft Shropshire Local Plan. Any development of this site would be expected to comply with the wider policies of the draft Shropshire Local Plan. Shropshire Council considers that identification of this proposed allocation was informed by a proportionate and robust site assessment.
- h. Site assessment process does not adequately reflect the characteristics and constraints present at Much Wenlock. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which

included consideration of the characteristics and constraints present in Much Wenlock. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation.

- i. There is insufficient need for this site and it represents over-development. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation.
- j. The site will not be supported by appropriate employment opportunities, services, facilities or infrastructure and as such is unsuitable for development/will not achieve sustainable development. Shropshire Council considers that an appropriate and deliverable development strategy is proposed for Much Wenlock and that proposed allocation MUW012VAR represents a key component of this strategy. The Council also considers that the proposed allocation is informed by a proportionate and robust site assessment which included consideration of infrastructure needs and opportunities. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation. Furthermore, Shropshire Council has and continues to engage with key infrastructure providers and local communities to ensure that the infrastructure needs are identified and to facilitate their delivery. Draft Policy DP25 provides certainty that necessary infrastructure will be in place to support development in Shropshire.
- k. There has been a lack of consideration of infrastructure capacity in the site assessment process. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included consideration of infrastructure needs and opportunities. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation. Furthermore, Shropshire Council has and continues to engage with key infrastructure providers and local communities to ensure that the infrastructure needs are identified and to facilitate their delivery. Draft Policy DP25 provides certainty that necessary infrastructure will be in place to support development in Shropshire.
- l. The highway infrastructure cannot support this development and increased traffic from it will damage the character of the town and setting of the Shropshire Hills AONB. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment which included analysis

by Highway Officers. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation.

- m. There is insufficient water and sewerage to support this development. The evidence base for the draft Shropshire Local Plan includes a Water Cycle Study, which has informed the proposals within the draft Shropshire Local Plan – including settlement strategies and site allocations.
- n. Development of the site will have a detrimental impact on tourism, which is unacceptable. Shropshire Council considers that the proposed allocation is informed by a proportionate and robust site assessment. The assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation.
- o. There is no justification for the increase in the size of the site from that originally proposed. Through consultation and discussions with the site promoter (involving the Council's Drainage and Flood Risk Manager), it became apparent that in order to ensure the delivery of necessary flood alleviation both for the site itself and off-site at Hunters Gate and Forester Avenue, as a community benefit, it was necessary to expand the size and capacity of the site. This is reflected within the proportionate and robust site assessment. Shropshire Council considers the assessment process and conclusions reached are unambiguously summarised and fully justify the identification of MUW012VAR as a proposed allocation.

1.20. Shropshire Council is also aware that responses to the Post Stage 1 Interim Findings Consultation included objections to the site assessment process which informed identification of MUW012VAR as a proposed allocation and the allocation itself. These responses are summarised in GC52. The issues raised are generally consistent with those from the Regulation 19 consultation.

1.21. In conclusion, Shropshire Council considers that MUW012VAR 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. MUW012VAR is proposed to be allocated for residential development. This site comprises 5.86ha of greenfield land

adjoining the southern edge of Much Wenlock which is a proposed Key Centre. The approximate site provision figure is for 120 dwellings.

- 2.2. Detailed development guidelines within Schedule S13.1(i) of draft Policy S13.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1, DP3, and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. The development would be expected to provide a broad range of housing with potential for family housing, age specific / special needs housing and affordable provision.
- 2.5. Critically, this development will be required to deliver substantial community benefits both on and off site by way of flood alleviation.
- 2.6. Specifically, development must demonstrate how properties currently at risk of flooding at Hunters Gate and Forester Avenue will be protected for all storm events up to and including the 1% Annual Exceedance Probability (AEP) event plus an appropriate allowance for climate change, as well as removing exceedance water from the existing surface water and foul sewer systems serving Much Wenlock.
- 2.7. Where offsite attenuation features are proposed it must also demonstrate that the design of these features will ensure there is no increase in flood risk to properties downstream of Much Wenlock on the Farley Brook for all storm events up to an including the 1% AEP event plus an appropriate allowance for climate change.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S13.1(i) of draft Policy S13.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of MUW012VAR.
- 3.2. Initially the allocation proposed for Much Wenlock was site MUW012, a 3.81ha site proposed for around 80 dwellings, which was subject to Regulation 18 Plan Making consultation (EV005.01).

- 3.3. Through this consultation and subsequent discussions with the site promoter, involving the Council's Drainage and Flood Risk Manager, it became apparent that in order to ensure the delivery of necessary flood alleviation both for the site itself and off-site at Hunters Gate and Forester Avenue, as a community benefit, it was necessary to expand the size and capacity of the site.
- 3.4. As such, the proposed allocation at Much Wenlock was amended to MUW012VAR, a 5.86ha site which consisted of the entirety of MUW012 plus a further additional agricultural field of some 2.05ha. The approximate site capacity was also increased to 120 dwellings.
- 3.5. In addition to the considerable community benefits associated with on and off site flood alleviation, this extension will also enhance the sites viability, thereby facilitating the highway infrastructure works required to make this development acceptable, which include a new roundabout on the A458.
- 3.6. This amended proposed allocation and associated proposed site guidelines were subsequently subject to and informed by Regulation 18 Plan-Making consultation (EV007.01).
- 3.7. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

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

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

**Shropshire Council Response:**

- 5.1. MUW012VAR 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, this development will be required to deliver substantial community benefits both on and off site by way of flood alleviation.

- 5.3. Specifically, development must demonstrate how properties currently at risk of flooding at Hunters Gate and Forester Avenue will be protected for all storm events up to and including the 1% Annual Exceedance Probability (AEP) event plus an appropriate allowance for climate change, as well as removing exceedance water from the existing surface water and foul sewer systems serving Much Wenlock.
- 5.4. Where offsite attenuation features are proposed it must also demonstrate that the design of these features will ensure there is no increase in flood risk to properties downstream of Much Wenlock on the Farley Brook for all storm events up to an including the 1% AEP event plus an appropriate allowance for climate change.
- 5.5. Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of MUW012VAR 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 Much Wenlock and Shropshire.
- 5.6. 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.
- 5.7. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Providing a new roundabout on the A458, which will act serve the development and act as a gateway to the town.
  - b. Providing afore-referenced on and off site flood alleviation.
  - c. Substantial and effective boundary treatments, including reinstatement of the hedgerow along the sites southern boundary.
  - d. Ability to provide green infrastructure and open space, linking to the public right of way network beyond the site and incorporating high-quality trees and hedgerows.
- 5.8. More generally, it is also considered that development of MUW012VAR 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 MUW012VAR 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 MUW012VAR.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that MUW012VAR 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 MUW012VAR within Schedule S13.1(i) of draft Policy S13.1 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. Applying the precautionary principle, this site consists of best and most versatile agricultural land. However, this applies to all land around Much Wenlock. This has been appropriately considered within the site assessment.
  - b. A component of the site is located within the surface water flood risk zone and it is known that Much Wenlock is located within a Flood Rapid Response Catchment in the highest category. Site guidelines require the delivery of on and off site flood alleviation (with sufficient detail of the design and evidence of how requirements will be achieved before consent is granted). Site guidelines also stipulate that any residual surface water flood risk within the site will be managed by excluding development from the affected areas of the site, which will form part of the green Infrastructure / open space network; and flood and water management measures must not displace water elsewhere.
  - c. The site is deemed to have medium-high visual sensitivity. This has been appropriately considered within the site assessment. Furthermore, site guidelines expect the provision of substantial and effective boundary treatments in order to create a buffer around the site.

- d. There is a need to provide an appropriate access (roundabout) into the site. Site guidelines require provision of a new roundabout on the A458.
- e. The site contains trees and hedgerows. As such, site guidelines require high-quality trees and hedgerows to be retained and incorporated into green infrastructure provision. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- f. Site previously formed part of the Much Wenlock racecourse (HER PRN 30643) and contains the probable site of a prehistoric cropmark enclosure (HER PRN 30617), as such it has archaeological potential. This has been appropriately reflected within the site assessment. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
- g. Noise associated with the adjoining road. Site guidelines require acoustic design, layout, use of green infrastructure and appropriate building materials to appropriately manage this issue. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- h. The site is located within a Grades 2 and 3 Source Protection Zones (Grade 3 applies to the majority of Much Wenlock and the land around it). This has been appropriately reflected within the site assessment and draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in Source Protection Zones.

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

**Shropshire Council Response:**

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to



Question 1 on proposed allocation MUW012VAR provides further information on the site assessment process.

- 7.4. In summary, the flood risk at MUW012VAR recognises a limited fluvial flood risk to the proposed allocated site which is located entirely within Flood Zone 1 which is the lowest risk of flooding. The flood risk also recognises:
- a. Around 1% of MUW012VAR lies within the 30 year surface flood risk zone.
  - b. Around 4% of MUW012VAR lies within the 100 year surface flood risk zone.
  - c. Around 25% of MUW012VAR lies within the 1,000 year surface flood risk zone.
- 7.5. The location of Much Wenlock on the backslope of the Wenlock Edge escarpment poses a fluvial flood risk to many areas of the settlement particularly in severe conditions and flood alleviation balancing ponds have been provided on the western approaches to the settlement.
- 7.6. the situation of MUW012VAR on the eastern edge of Much Wenlock, and the extension of the initial site proposal to include a larger area of land, provides the opportunity to accommodate flood alleviation measures for the existing residential development surrounding proposed allocate site of MUW012VAR.
- 7.7. The proposed site guidelines for MUW012VAR within Schedule S13.1(i) of draft Policy S13.1 address these issues, stating:

*"Development will be required to deliver substantial community benefits both on and off site by way of flood alleviation. Specifically, development must demonstrate how properties currently at risk of flooding at Hunters Gate and Forester Avenue will be protected for all storm events up to and including the 1% Annual Exceedance Probability (AEP) event plus an appropriate allowance for climate change, as well as removing exceedance water from the existing surface water and foul sewer systems serving Much Wenlock.*

*Where offsite attenuation features are proposed it must also demonstrate that the design of these features will ensure there is no increase in flood risk to properties downstream of Much Wenlock on the Farley Brook for all storm events up to an including the 1% AEP event plus an appropriate allowance for climate change.*

*Given the importance of this issue, development proposal will be required to provide sufficient detailed designs evidencing how these measures will be achieved in practice in order for planning permission to be granted.*

*Any residual surface water flood risk within the site will be managed by excluding development from the affected areas of the site, which will form part of the green Infrastructure / open space network. Flood and water management measures must not displace water elsewhere."*

- 7.8. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation MUW012VAR passed the sequential test and the exception test was not required.
- 7.9. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of MUW012VAR 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 MUW012VAR.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that MUW012VAR 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 MUW012VAR within Schedule S13.1(i) of draft Policy S13.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and

Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 8.5. The site guidelines include:
  - a. Detailed requirements regarding the provision of on and off site flood alleviation.
  - b. Provision of a new roundabout on the A458, which will act serve the development and act as a gateway to the town.
  - c. Provision of substantial and effective boundary treatments, including reinstatement of the hedgerow along the sites southern boundary.
  - d. Green infrastructure and open space, linking to the public right of way network beyond the site and incorporating high-quality trees and hedgerows.
- 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 MUW012VAR. 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 MUW012VAR is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within their Regulation 19 consultation response (reference A0370), the site stated *"At this stage we have carried out a massing exercise and can confirm that the site can accommodate a maximum of 120 dwellings together with the required roundabout and drainage infrastructure. We have also commissioned all of the various reports necessary to support a planning application and will be bringing forward the application in 2021 to demonstrate commitment to delivery of the site. The Estate are committed to delivering a high quality, beautiful development which will be in keeping with the surrounding landscape and local vernacular.*

*There will be a requirement for natural open space within the development and it is envisaged that the current planted boundary to the site will need to be displaced and replaced with compensatory planting on the new site boundary.*

*It is proposed that the development will deliver a good mix of housing including fulfilling the policy requirement to build 20% of the overall housing numbers as affordable dwelling. The development will deliver a Community Infrastructure Levy (CIL) contribution of £59.64 per square metre of build and the development overall could generate an overall CIL receipt somewhere in the region of £900,000 to spend on local projects. The Estate are not seeking to reduce either of these contributions on viability grounds."*

- 9.4. The representation also states *"We note and accept the development guidelines set by the Council..."*

**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 MUW012VAR 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 36 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. The Council would note that the promoter of the site specified within their Regulation 19 Representation (A0370 – referenced in response to question 9 on site MUW012VAR) supported this conclusion.

**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 MUW012VAR 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 MUW012VAR.
- 11.3. The boundary for MUW012VAR is defined by residential curtilages, the curtilage of Much Wenlock Primary School and Hunters Gate to the north, residential curtilages and agricultural field boundaries to the east, an agricultural field boundary to the south, and Bridgnorth Road to the west.

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

**Shropshire Council Response:**

- 12.1. Yes. Shropshire Council considers the proposed site guidelines for MUW012VAR within Schedule S13.1(i) of draft Policy S13.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of MUW012VAR; 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 MUW012VAR.
- 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 MUW012VAR – 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 MUW012VAR.
- 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 MUW012VAR, 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/objections on specific site guidelines proposed for MUW012VAR. These are summarised in SD014.01 and GC4o. They include:

- a. There is no certainty about effectiveness of flood management measures. Shropshire Council considers the proposed site guidelines on flood risk measures are appropriate and effective. In particular, the Council would note that they include an expectation that any development proposal will be required to provide sufficient detailed designs evidencing how these measures will be achieved in practice in order for planning permission to be granted.
- b. Consider alleviation of flood risk at Hunters Gate should be a pre-condition to development of the site. Shropshire Council considers that the proposed site guidelines regarding flood risk for MUW012VAR are appropriate and proportionate.
- c. The site is located in source protection zones 2 and 3. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures will be required. Shropshire Council agrees with these principles and would note that site guidelines for flood management include an expectation that they remove exceedance water from the existing surface water and foul sewer systems serving Much Wenlock. Furthermore, draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in Source Protection Zones.
- d. No guarantee the site will deliver a range of house sizes, types and tenures (including affordable housing) to meet local needs. Draft Policies DP2 and DP3 detail proposed requirements for housing to ensure an appropriate range of house sizes, types and tenures (including affordable housing).
- e. No guarantee open space and recreation facilities (particularly for the young) will be provided. Proposed site guidelines detail expectations for green infrastructure provision. Furthermore, draft Policies DP14 and DP15 provide specific requirement on green infrastructure and open space provision.
- f. The proposed roundabout is only to serve the site, there are alternative mechanisms that would be effective to achieve traffic calming. A roundabout will create delays, noise and street lighting intrusion and badly impact both congestion and air

quality and critical Gaskell Corner junction. The requirement for a roundabout has been informed by the site assessment process, which was informed by analysis by Highway Officers. The Council consider this roundabout has the potential to provide an appropriate access to the site, support the achievement of traffic calming on Bridgnorth Road and form a gateway to the town.

### **Questions: Site Allocation CES005 – Land adjoining The Vicarage on A458, Cressage**

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

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

- 1.1. The proposed allocation CES005 lies to the south of Cressage. It primarily consists of open agricultural land bounded largely by residential curtilages to the north and south, the road frontage of the A458 to the east and agricultural boundaries to the west and completing the boundaries to north and south.
- 1.2. To inform the identification of proposed site allocations, including CES005, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or



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

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 6 sites were considered at Cressage. Within Stage 3 of the site assessment process, around 3 sites were considered at Cressage.
- 1.11. CES005 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 CES005 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection (summarised in SD014.01 and GC4o) to the site and the assessment process undertaken to identify proposed allocation CES005. This included:
- a. That the site capacity be reduced to 40 dwellings in order to allocate proposed site CES002. The combination of these two sites is suggested to meet an increased settlement guidelines figure for 140 dwellings. This higher housing guideline figure and the provision of two significant housing allocations was considered to provide a more appropriate strategy and scale of development for Cressage that was capable of delivering sufficient affordable housing to meet local needs.
  - b. Proposed allocation CES005 has not been adequately assessed in relation to the safety of the proposed site access and the existing pedestrian crossing, the adequacy of the proposed traffic calming measures, the suitability of the pedestrian access to Wood Lane for those with restricted mobility, the locally recognised flood risk on the site and the protection of the Wood Lane Local Wildlife Site.
  - c. Proposed allocation CES005 has not adequately addressed the traffic safety issues caused by through traffic speeding within the restricted zones through village.
- 1.14. Shropshire Council is also aware that representations during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) raised objections to proposed allocated sites and to the site assessment process to identify proposed allocations.
- 1.15. A single response about CES005 was received to this consultation. This response supported the designation of Cressage as a Community Hub and the proposed allocation of CES005 for housing development.
- 1.16. In conclusion, Shropshire Council considers that CES005 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. CES005 is proposed to be allocated for residential development. This site comprises 2.41ha of greenfield land partially forming an 'infilling' site within the urban form of Cressage which is designated as a Community Hub. The approximate site provision figure is for 60 dwellings and this capacity has been proposed in a specific development scheme for the site.
- 2.2. Detailed development guidelines within Schedule S13.2(i) of draft Policy S13.2 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. The development would be expected to provide a broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S13.2(i) of draft Policy S13.2 were informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of CES005.
- 3.2. It was also informed by Regulation 18 Plan-Making consultation, proactive engagement with the site promoter and by the discussions with the site developer during the determination of their planning application.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy which is evidenced by the early release of the site to the market. This strategy has been affected by detailed technical constraint affecting the achievement of a suitably visible access into the site. This has resulted in the early planning application for the development of the site being refused.
- 3.4. The site developer is considering this detailed technical constraint with a view to securing a more visible vehicular access and

submitting a revised planning application for the early development of the site following the adoption of the Local Plan.

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

**Shropshire Council Response:**

- 4.1. This greenfield site was the subject of an Outline Planning Application (21/01022/OUT) for the development of up to 60 dwellings. This Outline Planning Application was refused permission on technical grounds in relation to the visibility of the proposed highway access onto the A458. The site developer is considering this detailed technical constraint with a view to securing further land to provide a more visible vehicular access. Where this technical constraint is resolved and the proposed allocation for CES005 is adopted, the site developer proposes to submit a revised planning application with the intention of securing the early delivery of the development within the remaining Plan period to 2038.

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

**Shropshire Council Response:**

- 5.1. CES005 is a proposed residential allocation comprising 2.41 hectares which is proposed for 60 dwellings. 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 CES005 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 Cressage and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft

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

- a. Delivering a broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing in this village which has only received affordable housing provision over the previous 14 years.
  - b. Delivering a new highway access to create a gateway feature with speed restrictions and traffic calming measures positioned south of the site access to reduce the levels of through traffic speeding through the village.
  - c. Delivering a footway along the frontage to the existing crossing over A458 to improve pedestrian safety in the village.
  - d. Delivering a secondary pedestrian and cycling access from the development through the secondary frontage onto Wood Lane.
- 5.5. More generally, it is also considered that development of CES005 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 CES005 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 CES005.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CES005 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 initial assessment of the visibility of the proposed site access to CES005 was considered to achieve the necessary visibility distances. The detailed investigation of these visibility distances was adversely affected by the absence of an existing footway on the site frontage, along the A458. Detailed investigations of the visibility distances submitted with Outline Planning Application (21/01022/OUT) for the development of this greenfield site revealed that the visibility distances fell a little way short of the minimum required.
- 6.4. The detailed issues affecting the site visibility distances reflect two key facts: the original landowner had separately disposed of part of their property at CES005 including part of the site frontage. The remaining site frontage lacked an existing footway and so, visibility

distances are calculated from a point deeper into the body of the site, which reduces the achievable visibility distances. The site developer is seeking to secure additional land adjacent to CES005, to achieve and maintain the necessary site visibility distances north and south along the A458.

- 6.5. The balance of the draft site guidelines for CES005 within Schedule S13.2(i) of draft Policy S13.2 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.
- 6.6. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Proximity to the strategic highway of the A458 providing a primary route for through traffic movements in the County. Site development guidelines identify the location on A458 may require stand-off distance, layout, orientation, landscaping, open space and design to enhance amenity with possible sound attenuation and ventilation measures closer to A458.
  - b. Highway visibility and safety on the A458 for access to the site by vehicle or on foot. The site development guidelines provide a series of measures to achieve these objectives requiring the delivery of:
    - i. A new highway access to create a gateway feature.
    - ii. Further investigation of the site visibility distances and the need to re-assess traffic calming measures.
    - iii. Speed restrictions and traffic calming measures positioned south [and north] of the site access to reduce the levels of through traffic speeding through the village.
    - iv. A footway along the frontage to the existing crossing over A458.
    - v. A secondary pedestrian and cycling access from the development through the secondary frontage onto Wood Lane.
  - c. Site is adjacent to the Wood Lane Local Wildlife Site requiring investigations of any adverse impacts. Site guidelines require further investigation through ecology, tree and hedgerow surveys including protection of Wood Lane Local Wildlife Site from increasing emissions and protection of the tree / woodland belt to west of the site.
  - d. The site is elevated in the landscape and the land gradient slopes gently downwards towards the urban area of the village and the valley and watercourse of the Brook leading into the adjacent River Severn. Whilst the land is entirely Flood Zone 1, localised surface water flood risks should be investigated and managed.

Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.

- e. The site size and its greenfield character indicates the need for investigation of the archaeological interest of the site. Site guidelines require relevant supporting studies to be undertaken particularly an heritage impact assessment including the archaeological interest of the site.
- f. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to much of the land around Cressage. This has been appropriately considered within the site assessment.

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

**Shropshire Council Response:**

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation CES005 provides further information on the site assessment process.
- 7.4. In summary, CES005 is located entirely within Flood Zone 1 which is the lowest risk of flooding. The limited fluvial flood risk to the proposed allocated site CES005 is a consequence of the elevated position of the site within the settlement. There is no evidence of any significant surface water flooding across the site.
- 7.5. The proposed site guidelines for CES005 within Schedule S13.2(i) of draft Policy S13.2 addressed the potential for flood risks arising from the proposed development, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water risks will be managed by excluding development from the affected areas which will form*

*part of the Green Infrastructure network. Water management measures must not displace water elsewhere."*

- 7.6. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation CES005 passed the sequential test and the exception test was not required.
- 7.7. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for CES005 address this issue, stating "*Relevant supporting studies to be undertaken particularly transport assessments, drainage, heritage and especially archaeology interest, ecology, tree and hedgerow surveys including protection of Wood Lane Local Wildlife Site from increasing emissions, protection of tree / woodland belt to west. Recommendations of studies to be clearly reflected in the development scheme."*

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

**Shropshire Council Response:**

- 8.1 Potential constraints and the infrastructure requirements and opportunities associated with any development of CES005 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 CES005.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CES005 constituted an appropriate proposed employment allocation within the Garden Village; it is possible to achieve the sustainable development of this site; and the development of the site is viable and deliverable.
- 8.3 The draft site guidelines for CES005 within Schedule S13.1(i) of draft Policy S13.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Economic



Growth Strategy for Shropshire (EV044); Strategic Infrastructure and Investment Plan (GC54); Sustainability Appraisal (SD006.05); Green Infrastructure Strategy (EV052.01-EV052.30); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

8.5 The site guidelines include:

- a. Delivering a broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing in this village.
- b. Providing significant highway improvements and infrastructure to ensure the safety of traffic and pedestrians on the A458 and those accessing the site:
  - i. A new highway access to create a gateway feature.
  - ii. Further investigation of the site visibility distances and the need to re-assess traffic calming measures.
  - iii. Speed restrictions and traffic calming measures positioned south [and north] of the site access to reduce the levels of through traffic speeding through the village.
- c. Enhancing pedestrian, cycle and vehicular links to and through the site – particularly over the A458 and through a secondary access to the rear of the site onto Wood Lane.
  - i. A footway along the frontage to the existing crossing over A458.
  - ii. A secondary pedestrian and cycling access from the development through the secondary frontage onto Wood Lane.
- d. Providing a green infrastructure scheme to landscape the site and safeguard the natural assets of the site and its setting, to:
  - i. Protect the Wood Lane Local Wildlife Site.
  - ii. Protect the tree / woodland belt to west of the site.
  - iii. Protect foraging and passage of species and their habitat.
- e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure scheme.
- f. Recording and recovery of archaeological assets on the site.

8.6 Shropshire Council expects the 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 CES005. 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 CES005 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of CES005 stated " "Proposed allocation CES005 is highly deliverable and viable." This simple statement reflected the intention of the site developer to secure an early consent and to deliver the development.
- 9.4. The Council have already identified that this greenfield site has been the subject of an Outline Planning Application (21/01022/OUT) for the development of up to 60 dwellings. This Outline Planning Application was only refused permission on technical grounds in relation to the visibility of the proposed highway access onto the A458. The site developer is considering this detailed technical

constraint with a view to securing further land to provide a more visible vehicular access.

- 9.5. The site developer intends to submit a further application to develop CES005. This reflects the fact that, Cressage has been a Countryside Settlement for at least 14 years and the opportunity to obtain open market housing in the village is expected to generate significant market demand.

**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 CES005 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2029/30. Shropshire Council considers this expected timescale is realistic and deliverable but on the adoption of the Plan, CES005 is likely to be completed early in the period from 2025/26.
- 10.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of CES005 stated "Proposed allocation CES005 is highly deliverable and viable." This simple statement reflected the intention of the site developer to secure an early consent and to deliver the development.
- 10.4. The Council have already identified that this greenfield site has been the subject of an Outline Planning Application (21/01022/OUT) for the development of up to 60 dwellings.

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation CES005 is in the main, entirely appropriate. There is a nominal need to extend the eastern boundary to incorporate sufficient additional land to secure and maintain effective visibility distances along the A458.
- 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 CES005.

- 11.3. This boundary for CES005 consists largely of residential curtilages to the north and south, the road frontage to the A458 to the east and agricultural boundaries to the west and completing the boundaries to north and 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 CES005 within Schedule S13.2(i) of draft Policy S13.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of CES005; 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 CES005.
- 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 CES005 – 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 CES005.

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 CES005, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:

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

12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no further objections to CES005.

12.9 Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.

### **Questions: Site Allocation CES006 – The Eagles public house on A458, Cressage**

**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 CES006 lies in the southern central area of Cressage along the A458 at the junction with Sheinton Road and the B4380. At this point, the A458 forms a sharp bend leading towards

the northern entrance to the village. This three point junction joins the A458 on the sharp bend and the junction also contains the local war memorial.

- 1.2. CES006 comprises the building and curtilage car park of The Eagles, a former public house serving the village. The public house building, which is now listed, sits directly onto the A458 frontage except for a narrow footway along the A458. The allocation comprises both the former public house and the surrounding car park situated to the rear of the site. CES006 is bounded by the A458 to the west, Sheinton Road to the south and residential curtilages to the north and east.
- 1.3. To inform the identification of proposed site allocations, including CES006, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability:* Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.

- c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.9. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Shrewsbury Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 6 sites were considered at Cressage. Within Stage 3 of the site assessment process, around 3 sites were considered at Cressage.
- 1.12. CES006 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and CES006 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).

- 1.14. Shropshire Council considered representations from the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) in the assessment process undertaken to identify proposed allocation CES006. The only representations received in relation to CES006 supported the proposed allocation and in one instances suggested a higher site capacity for the re-development.
- 1.15. Shropshire Council considered representations from the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) but no objections were received to CES006.
- 1.16. In conclusion, Shropshire Council considers that CES006 was identified through a proportionate and robust site assessment process. This response 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. CES006 was considered to be a popular proposed housing allocation in Cressage.

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

**Shropshire Council Response:**

- 2.1. CES006 is proposed to be allocated for residential development. This site comprises the 0.23ha previously developed site and buildings of the former Eagles public house in the village of Cressage which is designated as a Community Hub. The approximate site provision figure is for 4 dwellings with 2 dwellings already approved through the redevelopment of the partially listed Eagles public house. The curtilage and car park of the former public house remain to be allocated and approved for development.
- 2.2. Detailed development guidelines within Schedule S13.2(i) of draft Policy S13.2 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. The development would be expected to provide two distinct but interrelated elements to deliver around 4 dwellings on the site through: Sympathetic conversion of the former pub' building for up to 2 dwellings, to conserve and enhance the significance of the designated heritage asset and to improve the appearance and appreciation of the asset and the site. Develop the former car park for up to 3 new dwellings.



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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S13.2(i) of draft Policy S13.2 were informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of CES006.
- 3.2. It was also informed by Regulation 18 Plan-Making consultation, proactive engagement with the site promoter and by the discussions with the site developer during the determination of a series of early planning applications to develop the listed former public house building and the curtilage and car park.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy which is evidenced by the early approval for the redevelopment of the former public house building. The release of the whole site including the car park has been affected by detailed technical constraints on the capacity and layout of the site.

**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 previously developed site of CES006 is currently the subject of a Full Planning Permission (21/02078/FUL) has been granted for the conversion of the former public house building to 2No. dwellings. A further Outline Planning Application (23/00525/OUT) for the redevelopment of the former public housing curtilage and car park for 4No. self-build houses has recently been refused on technical grounds. This refusal of planning permission has been appealed under APP/L3245/W/24/3341007 and is expected to be considered through written representations before the Stage 2 Hearings in November 2024.

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

**Shropshire Council Response:**

- 5.1. CES006 is a proposed residential allocation comprising 0.23 hectares which is proposed for around 4 dwellings. 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 CES006 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 Cressage 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. Sympathetic conversion of the partially listed former public house to conserve its historic interest and visual appearance.
  - b. Develop the remaining land within the car park for housing with a scheme that respects the setting of the heritage asset.
  - c. Site design to manage proximity to A458 and need for distance, layout, orientation, sound attenuation and ventilation to reduce any impacts on residential amenity.
  - d. Improve visibility and safety of A458 junction with Sheinton Road. Where the site bounds the highway, to partially reposition the site boundary wall to improve sightlines south (uphill) along the A458.
  - e. Close the site to vehicular access from the A458 frontage in favour of the existing vehicular access from Sheinton Road.
  - f. Accommodate a footway within the site between the A458 and Sheinton Road to replace the narrow A458 footway and facilitate pedestrian movements from Sheinton Road.
  - g. Incorporate appropriate drainage infrastructure scheme informed by a sustainable drainage strategy and ensure water management measures do not displace water from the site.
- 5.5. More generally, it is also considered that development of CES006 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 CES006 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 CES006.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CES006 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 CES006 within Schedule S13.2(i) of draft Policy S13.2 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. Historic building conversion and redevelopment of car park to consider:
    - i. Conservation of former public house building and curtilage which are now within a designated heritage asset in a key location within the historic core of Cressage.
    - ii. noise mitigation from A458 to include stand-off distance, glazing and ventilation considerations, layout and orientation of dwellings, boundary treatment.

Site guidelines require sympathetic conversion of the partially listed former public house to conserve its historic interest and visual appearance. Development of the remaining land within the car park for housing requires a scheme that respects the setting of the heritage asset.

This small, tightly contained site also requires an appropriate drainage infrastructure scheme informed by a sustainable drainage strategy to provide appropriate water management measures and to avoid displacing water from the site.
  - b. Highway access should be to Sheinton Road with provision of new footway and existing footway along A458 should be widened. A458 junction with Sheinton Road should be improved to increase safety and visibility at the junction.

Site guidelines require the design to manage proximity to A458 with stand-off distance, layout, orientation, sound attenuation and ventilation to reduce any impacts on residential amenity. To improve visibility and safety of A458 junction with Sheinton Road. Where the site bounds the highway, to partially reposition the site boundary wall to improve sightlines south (uphill) along the A458. To close the site to vehicular access from the A458 frontage in favour of the existing vehicular access from Sheinton Road. To accommodate a footway within the site between the A458 and Sheinton Road to replace the narrow A458 footway and facilitate pedestrian movements from Sheinton Road.

- c. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.

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

**Shropshire Council Response:**

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation CES006 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at CES006 recognises a limited fluvial flood risk to the proposed allocated site. This because CES006 is located entirely within Flood Zone 1 which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across the site.
- 7.5. The proposed site guidelines for CES006 within Schedule S13.2(i) of draft Policy S13.2 addressed the potential for flood risks arising from the proposed redevelopment of this previously developed site, stating *"The site will incorporate appropriate drainage infrastructure informed by a sustainable drainage strategy and will ensure the water management measures do not displace water elsewhere."*

- 7.6. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation CES006 passed the sequential test and the exception test was not required.
- 7.7. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for CES006 address this issue, stating *"Relevant supporting studies will be undertaken particularly transport assessments, heritage including archaeology, ecology in the redundant building, site margins and adjacent undisturbed sites, tree survey, surface water flood risk / drainage and ground contamination with their recommendations clearly reflected in the proposed development scheme."*

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of CES006 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 CES006.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CES006 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 CES006 within Schedule S13.2(i) of draft Policy S13.2 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. Upgrading the existing site access to the local road network at Sheinton Road and providing necessary improvements to the strategic road network by closing the existing A458 site access and improving the A458/ Sheinton Road junction to improve visibility and safe access onto the A458.
  - b. Providing a footway along the southern road frontage at Sheinton Road and widening the footway along the principal frontage onto the A458.
  - c. Providing an appropriate drainage infrastructure scheme informed by a sustainable drainage strategy to provide appropriate water management measures and to avoid displacing water from the site significant natural site boundaries.
  - d. Provision of open space.
- 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 CES006. 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 CES006 is realistically viable and deliverable because the site has significantly advanced through the planning process in advance of becoming an adopted housing allocation.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of CES006 stated *"The site as a whole is viable as it is developable and deliverable. The phasing of the development is currently focused on the conversion of the former public house, which already has extant permission for the conversion to one dwelling. Research suggests it may be necessary to deliver two dwellings from the conversion. This is because the building has been listed and to achieve a high quality and economically viable conversion may require the development of an additional dwelling. The car park to the former public house is developable and deliverable in accordance with the proposed site guidelines and policies of the emerging. Development Plan, the phasing of this part of the site will be determined against the emerging policies of the Development Plan which support the redevelopment of the site."*
- 9.4. The Council would also note that a Full Planning Permission (21/02078/FUL) has been granted for the conversion of the former public house building to 2No. dwellings. A further Outline Planning Application (23/00525/OUT) for the redevelopment of the former public housing curtilage and car park for 4No. self-build houses has recently been refused on technical grounds. This refusal of planning permission has been appealed under APP/L3245/W/24/3341007 and is expected to be considered through written representations before the Stage 2 Hearings in November 2024.

**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 CES006 are summarised within Appendix 7 of the draft

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

- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2029/30. Shropshire Council considers this expected timescale is realistic and deliverable but on the adoption of the Plan, CES006 is likely to be completed early in the period from 2025/26.
- 10.3. Shropshire Council would also note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of CES006 stated *"The site as a whole is viable as it is developable and deliverable. The phasing of the development is currently focused on the conversion of the former public house, which already has extant permission for the conversion to one dwelling. Research suggests it may be necessary to deliver two dwellings from the conversion. This is because the building has been listed and to achieve a high quality and economically viable conversion may require the development of an additional dwelling. The car park to the former public house is developable and deliverable in accordance with the proposed site guidelines and policies of the emerging. Development Plan, the phasing of this part of the site will be determined against the emerging policies of the Development Plan which support the redevelopment of the site."*
- 10.4. The Council would also note that a Full Planning Permission (21/02078/FUL) has been granted for the conversion of the former public house building to 2No. dwellings. A further Outline Planning Application (23/00525/OUT) for the redevelopment of the former public housing curtilage and car park for 4No. self-build houses has recently been refused on technical grounds. This refusal of planning permission has been appealed under APP/L3245/W/24/3341007 and is expected to be considered through written representations before the Stage 2 Hearings in November 2024.

**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 CES006 is entirely appropriate and there is no justification for its amendment because it simply comprises the former public house and curtilage of The Eagles in Cressage.



- 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 CES006.
- 11.3. This boundary for CES006 consists of the A458 and Sheinton Road and surrounding residential curtilages.

**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 CES006 within Schedule S13.2(i) of draft Policy S13.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of CES006; 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 CES006.
- 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 CES006 – 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 CES006.

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 CES006, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:

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

12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no further objections to CES006.

12.9 Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.