

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 17**



**Matter 17 - Market Drayton Place Plan Area (policy S11)**  
**- see MMs 092-095**

***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 Market Drayton Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Market Drayton Place Plan area is established within draft settlement policies S11.1-S11.4, and then appropriately expanded upon through the other policies of the draft Shropshire Local Plan.
- 1.3. These draft settlement policies align with and implement the proposed strategic approach to the level and distribution of development across Shropshire – particularly the principle of urban focus; but crucially are also responsive to the characteristics, constraints, and opportunities of the various settlements in the Place Plan area.
- 1.4. In positively responding to the characteristics, constraints and opportunities of the settlements in the Market Drayton Place Plan area, the draft Shropshire Local Plan identifies Market Drayton, Hinstock, Hodnet and Woore/Irelands Cross/Pipe Gate as locations to accommodate development.
- 1.5. Market Drayton is proposed to be identified as a Principal Centre, acting as a focus for strategic growth objectives in the north-east of the County. Policy S11.1 sets the Development Strategy for Market Drayton identifying the delivery of around 1,200 dwellings and making available around 35ha of employment land over the Plan period, which includes the expected delivery of 'saved' allocations, new allocations and additional windfall development.
- 1.6. Policy S11.1 outlines a key objective for the town to relocate the current sports facilities at Greenfield Lane, to land at Longford Turning. This local objective originated in a Neighbourhood Development Plan for the area, which unfortunately did not proceed

to referendum stage. However, this central objective remains a local priority and one which the Council has worked in partnership with the Market Drayton Sports Association and the Town Council to achieve. At the time of writing this remains a potential capital project for Shropshire Council to pursue within the lifetime of the Plan.

- 1.7. Hinstock, Hodnet and Woore/Irelands Cross/Pipe Gate are significant rural service centres and as such have been identified as Community Hubs where new development will respond to local needs consistent with Policy S11.2, Policy SP8, and other relevant policies of the Shropshire Local Plan. The housing guidelines for these areas are set out in Policy S11.2
- 1.8. Through this site assessment process four proposed allocations are identified at Market Drayton, and one site allocation each for Hinstock and Hodnet. A Neighbourhood Development Plan was adopted for Woore Parish on 25<sup>th</sup> July 2019 (EV086).
- 1.9. The most recent iteration of this assessment work for the Market Drayton Place Plan area is contained in document SD006.13.
- 1.10. It is considered the approach to the Place Plan is effective, justified and consistent with national policy. It is responsive to the conclusions of:
  - a. Sustainability Appraisal and Site Assessment processes (SD006.13).
  - 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).
- 1.11. 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.
- 1.12. The Council considers the proposed approach to development in the Place Plan area is consistent with national policy. In particular it:
  - a. Conforms with the principles of plan making in Chapter 3 of the 2021 National Planning Policy Framework (NPPF).
  - b. Supports delivery of sufficient and appropriate forms of housing, contributing to achievement of the housing needs of all groups

- within the communities of the Place Plan area, consistent with Chapter 5 of the NPPF.
- c. Supports the delivery of sufficient and appropriate forms of employment within the Place Plan area, consistent with Chapter 6 of the NPPF.
  - d. Promotes the health and wellbeing of communities within the Place Plan area, consistent with Chapter 8 of the NPPF.
  - e. Ensures the vitality of local centres and supports access to and use of sustainable transport, services and facilities, consistent with Chapter's 7, 9 and 10 of the NPPF.
  - f. Positively responds to the built and natural environment, presence of Green Belt within the Place Plan area, and the challenge of climate change, consistent with Chapter's 13-16 of the NPPF.

**Questions: Site Allocation MDR006 – Land adjoining Adderley Road, Market Drayton**

**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 is a greenfield site to the north of Market Drayton, to the north of the A53, and west of Adderley Road. It consists of an agricultural field and associated land.
- 1.2. The site was identified through a 'call for sites.' To inform the identification of proposed site allocations, including MDR006, 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 (SD0613), and it is clear from this assessment the wider options which were considered for the settlement.
- 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. Within Stages 2a and 2b of the site assessment process, around 45 sites were considered at Market Drayton, which was reduced to around 21 sites as part of the Stage 3 assessment process.
- 1.10. MDR006 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.

- 1.11. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and MDR006 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.12. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the site and the assessment process.
- 1.13. In conclusion, Shropshire Council considers that MDR006 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. MDR006 is proposed to be allocated for residential development. This site is 4.55 ha in size and the approximate site provision figure is some 125 dwellings.
- 2.2. Detailed development guidelines within Schedule S11.1(i) of draft Policy S11.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S11.1(i) of draft Policy S11.1 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.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through

the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

- 4.1. Bellway Homes submitted a full application for the development of 126 dwellings on the site (22/05309/FUL) in December 2022. This was refused in July 2024. The single refusal reason cited site specific design and layout concerns, such as the quality of open space provided on site, rather than the principle of development on the site. It is expected that Bellway will resubmit revised proposals.

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

**Shropshire Council Response:**

- 5.1. MDR006 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 Market Drayton and other communities in the Place Plan area.
- 5.2. The site represents an opportunity to further develop Market Drayton beyond the A53, which is considered a natural progression for the town to develop following the current allocations contained in the SAMDev Plan utilised much of the remaining land within the ring road.
- 5.3. As such, the proposed provision of a pedestrian and cycle links through the site and connecting the site to the town to the south is seen as a particular benefit. This would introduce new sections of footway and the introduction of a signal controlled pedestrian crossing on the A53.
- 5.4. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of MDR006 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 Market Drayton and Shropshire.

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

**Shropshire Council Response:**

- 6.1. Stage 3 of the Council's site assessment provided comments from wider service areas. Ecological comments required that adjacent pools would need to be adequately buffered, but this would be mitigated by potentially reducing the developable area.
- 6.2. The implications of seeking to develop to the north of the A53 potentially bring concerns of severance from the rest of the town, but it is considered the specific developer guideline to create enhanced pedestrian and cycle links through the site and the introduction of a signal controlled crossing on the A53 suitably mitigate this issue.
- 6.3. The A53 to the South and A529 to the east also provide significant noise sources which will need to be mitigated through stand-off distances, glazing, dwelling orientation and layout.

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

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations.
- 7.4. With specific regard to flood risk at MDR006, in summary:
  - a. With regard to fluvial flood risk, the site = is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 5% of the site is located within the 30 and 100 year surface flood risk zones and around 24% of the site is located within the 1,000 year surface flood risk zone.



- 7.5. The proposed site guidelines for MDR006 within Schedule S11.1(i) of draft Policy S11.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including MDR006. It concluded that the site MDR006 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of MDR006 were considered within stage 3 of the site assessment process.
- 8.2. The draft site guidelines for MDR006 within Schedule S11.1(i) of draft Policy S11.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.3. 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).
- 8.4. The site guidelines include:
  - a. Installation of a priority controlled junction to allow vehicular access and all necessary highway improvements.

- b. Pedestrian and cycle links within the site and beyond to the town, including new signal controlled pedestrian crossing on the A53.
  - c. Providing a green infrastructure buffer to adjacent pond.
  - d. Appropriate noise mitigation to the A53, A529 and Sych Farm employment area to the east.
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.5. 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.
- 8.6. 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.
- 8.7. 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 MDR006 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), which confirms that positive correspondence had been had with the site promoter and

within their Reg 19 comments confirms the site is deliverable within the next 5 years with no technical constraints.

- 9.3. Whilst the recent application on the site was refused due to site specific reasons, the Council consider the attachment of a major housing developer to the site further reinforces the site's viability and deliverability. None of the issues identified in the reason for refusal relate to viability.

**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 MDR006 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. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation MDR006 is entirely appropriate and there is no justification for its amendment.

**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 MDR006 within Schedule S11.1(i) of draft Policy S11.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of MDR006; 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.
- 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 MDR006 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. 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.

## **Questions: Site Allocation MDR012 – Land to the east of Maer Lane and north of the A53, Market Drayton**

**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 is a greenfield site to the east of Maer Lane to the north of Market Drayton, the north of the A53. It consists of an agricultural field and associated land.
- 1.2. The site was identified through a 'call for sites.' To inform the identification of proposed site allocations, including MDR012, the Council undertook a proportionate and robust three-stage site assessment process.
  - a. 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).
  - b. 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 (SD0613), and it is clear from this assessment the wider options which were considered for the settlement.
- 1.3. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.4. 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.

- 1.5. 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.
- 1.6. 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.
- 1.7. Within Stages 2a and 2b of the site assessment process, around 45 sites were considered at Market Drayton, which was reduced to around 21 sites as part of the Stage 3 assessment process.
- 1.8. MDR012 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.9. Before the Shropshire Local Plan making process, proposals for this site had been included in the draft version of the Market Drayton Neighbourhood Development Plan in 2016. Whilst the Neighbourhood Plan was unable to proceed to referendum stage following the conclusions of the examination process, it was considered suitable to give this due consideration in the overall balance of judgement regarding the selection of sites for inclusion in the Shropshire Local Plan. It should be stressed that the proposed inclusion of this site in the draft Neighbourhood Plan was not related to the reason for the Plan's failure to reach the referendum stage.
- 1.10. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and MDR012 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.11. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the site and the assessment process.

- 1.12. In conclusion, Shropshire Council considers that MDR012 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. MDR012 is proposed to be allocated for residential development. This site is 2.9 ha in size and the approximate site provision figure is 70 dwellings.
- 2.2. Detailed development guidelines within Schedule S11.1(i) of draft Policy S11.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S11.1(i) of draft Policy S11.1 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.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

4.1. The site has not yet been subject to a planning application.

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

**Shropshire Council Response:**

- 5.1. MDR012 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. The site represents an opportunity to further develop Market Drayton beyond the A53, which is considered a natural progression for the town to develop following the current allocations contained in the SAMDev Plan utilised much of the remaining land within the ring road.
- 5.3. Policy S11 (part 4) states that "*whilst land is not identified for this purpose, it is recognised there may be opportunities to deliver a marina and related uses in land at Victoria Farm*". This proposal originated as a town objective captured in the draft Market Drayton Neighbourhood Plan. Whilst the Neighbourhood Plan could not proceed to referendum following the examination process (for unrelated reasons to this objective), this clear objective was however considered within the balance of considerations for the allocation of land within the Shropshire Local Plan. As such, and given the proximity of MDR012 to Victoria Farm, the developer guidelines for the site identify the need to enhance or provide pedestrian and cycle links through the site linking both to the town to the south and to the proposed marina site to the north west of the site.

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

**Shropshire Council Response:**

- 6.1. Stage 3 of the Council's site assessment provided comments from wider service areas. Ecological comments required that the adjacent watercourse and hedgerows will need to be adequately buffered, which would be mitigated by reducing the overall developable area.



- 6.2. The site is within the setting of the Grade II listed Victoria Bridge, at the North East boundary of the site is adjacent to the associated Birmingham and Liverpool Junction Canal (Shropshire Union Canal). This is mitigated in the development guidelines for the site by the requirement for site design and layout to reflect the site's heritage and heritage assets within the wider area.
- 6.3. The A53 to the South and the existing boat yard to the north are identified as potential sources of noise. To mitigate this the development guidelines include the need for acoustic design, layout, green infrastructure and appropriate building materials to be used to appropriately manage noise arising from the A53, Maer Lane and Victoria Wharf.

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

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations.
- 7.4. With specific regard to flood risk at MDR012, in summary:
  - a. With regard to fluvial flood risk, the site is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 3% of the site is located within the 30 and 100 year surface flood risk zones and around 14% of the site is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for MDR012 within Schedule S11.1(i) of draft Policy S11.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network."*

*Flood and water management measures must not displace water elsewhere.”*

- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including MDR012. It concluded that the site MDR012 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which ‘trigger’ the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of MDR012 were considered within stage 3 of the site assessment process.
- 8.2. The draft site guidelines for MDR012 within Schedule S11.1(i) of draft Policy S11.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.3. 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).
- 8.4. The site guidelines include:
  - a. An appropriate vehicular access off Maer Lane, and necessary highway improvements undertaken.
  - b. Pedestrian and cycle links will be enhanced or provided, including to the location of the proposed marina at Victoria Wharf.
  - c. Green infrastructure buffering to the canal and environmental network.

- d. Appropriate acoustic design to manage arising from the A53, Maer Lane and Victoria Wharf.
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.5. 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.
- 8.6. 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.
- 8.7. 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 MDR012 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), which confirms that for MDR012 that the site promoter has confirmed the site is suitable, viable and deliverable within the early part of the plan period.

**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 MDR012 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 2031/32 and continue until 2033/34. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

**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 MDR012 is entirely appropriate and there is no justification for its amendment.

**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 MDR012 within Schedule S11.1(i) of draft Policy S11.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of MDR012; 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.
- 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 MDR012 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. 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.

### **Questions: Site Allocation MDR034 – Land west of Maer Lane and north of the A53, Market Drayton**

**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 is a greenfield site to the north of Market Drayton, to the north of the A53, and to the west of Maer Lane. The site is directly opposite MDR012, which is also proposed for allocation. It consists of an agricultural field and associated land.

- 1.2. The site was identified through a 'call for sites.' To inform the identification of proposed site allocations, including MDR034, 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 (SD0613), and it is clear from this assessment the wider options which were considered for the settlement.
- 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. Within Stages 2a and 2b of the site assessment process, around 45 sites were considered at Market Drayton, which was reduced to around 21 sites as part of the Stage 3 assessment process.
- 1.10. MDR034 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.11. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and MDR034 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.12. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did not include any significant objection to the site and the assessment process.
- 1.13. In conclusion, Shropshire Council considers that MDR034 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 MDR034 is proposed to be allocated for residential development. This site is 5.67 ha in size and the approximate site provision figure is 120 dwellings.
- 2.2 Detailed development guidelines within Schedule S11.1(i) of draft Policy S11.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3 The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft

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

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S11.1(i) of draft Policy S11.1 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.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

**Shropshire Council Response:**

- 4.1. The site has not yet been subject to a planning application.

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

**Shropshire Council Response:**

- 5.1. MDR034 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 Market Drayton and other communities in the Place Plan area.
- 5.2. The site represents an opportunity to further develop Market Drayton beyond the A53, which is considered a natural progression for the town to develop following the current allocations contained in the SAMDev Plan utilised much of the remaining land within the ring road.
- 5.3. Policy S11 (part 4) states that "*whilst land is not identified for this purpose, it is recognised there may be opportunities to deliver a marina and related uses in land at Victoria Farm*". This proposal originated as a town objective captured in the draft Market Drayton



Neighbourhood Plan. Whilst the Neighbourhood Plan could not proceed to referendum following the examination process (for unrelated reasons to this objective), this clear objective was however considered within the balance of considerations for the allocation of land within the Shropshire Local Plan. As such, and given the proximity of MDR034 to Victoria Farm, the developer guidelines for the site identify the need to enhance or provide pedestrian and cycle links through the site linking both to the town to the south and to the proposed marina site to the north west of the site.

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

**Shropshire Council Response:**

- 6.1 Stage 3 of the Council's site assessment provided comments from wider service areas. Ecological comments required that the adjacent watercourse and hedgerows will need to be adequately buffered, which would be mitigated by reducing the overall developable area.
- 6.2 The site is within the setting of the Grade II listed Victoria Bridge. This is mitigated in the development guidelines for the site by the requirement for site design and layout to reflect the site's heritage and heritage assets within the wider area.
- 6.3 The A53 to the south and the existing boat yard to the north are identified as potential sources of noise. To mitigate this the development guidelines include the need for acoustic design, layout, green infrastructure and appropriate building materials to be used to appropriately manage noise arising from the A53, Maer Lane and Victoria Wharf.

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

**Shropshire Council Response:**

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

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

- 7.3 The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations.
- 7.4 With specific regard to flood risk at MDR034, in summary:
  - a. With regard to fluvial flood risk, 5% of the site is located in Flood zone 3, 29% in Flood Zone 2 and 71% in Flood Zone 1.
  - b. With regard to other sources of flood risk, around 7% of the site is located within the 30 and 100 year surface flood risk zones and around 12% of the site is located within the 1,000 year surface flood risk zone.
- 7.5 In lines with the Council's Sequential and Exception Test Assessment (EV094) the proposed site guidelines for MDR034 within Schedule S11.1(i) of draft Policy S11.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6 On this basis it concluded that the site MDR034 passed the sequential test and that there is no requirement for the exception test.
- 7.7 Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of MDR034 were considered within stage 3 of the site assessment process.
- 8.2. The draft site guidelines for MDR034 within Schedule S11.1(i) of draft Policy S11.1 were informed by the site assessment process

and address key infrastructure requirements and the mechanisms to address identified constraints.

- 8.3. 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).
- 8.4. The site guidelines include:
  - a. An appropriate vehicular access off Maer Lane, and necessary highway improvements undertaken.
  - b. Pedestrian and cycle links will be enhanced or provided, including to the location of the proposed marina at Victoria Wharf.
  - c. Green infrastructure buffering to the watercourse and contribution to the environmental network.
  - d. Appropriate acoustic design to manage arising from the A53, Sych Farm employment area and Victoria Wharf.
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.5. 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.
- 8.6. 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.
- 8.7. 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 MDR034 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), which confirms that for MDR011 that the site promoter has confirmed the site is suitable, viable and deliverable within the early part of the plan period.

**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 MDR034 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 2031/32 and continue until 2035/36. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation MDR034 is entirely appropriate and there is no justification for its amendment.

**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 MDR034 within Schedule S11.1(i) of draft Policy S11.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of MDR034; 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.
- 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 MDR034 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. 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.

### **Questions: Site Allocation MDR039 & MDR043 – Land at Longford Turning, Market Drayton**

**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 is a combined site consisting of greenfield land either side of Longford Turning, which is located to the south-east of the town. The site is on the northern side of the A53. It consists of an agricultural field and associated land.
- 1.2. The site was identified through a 'call for sites.' To inform the identification of proposed site allocations, including MDR0039/043, the Council undertook a proportionate and robust three-stage site assessment process.
  - a. 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).
  - b. 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 (SD0613), and it is clear from this assessment the wider options which were considered for the settlement.
- 1.3. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.4. 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.
- 1.5. 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.
- 1.6. 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.
- 1.7. Within Stages 2a and 2b of the site assessment process, around 45 sites were considered at Market Drayton, which was reduced to around 21 sites as part of the Stage 3 assessment process.
- 1.8. MDR0039/043 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.9. Before the Shropshire Local Plan making process, proposals for this site had been included in the draft version of the Market Drayton Neighbourhood Development Plan in 2016. Whilst the Neighbourhood Plan was unable to proceed to referendum stage following the conclusions of the examination process, it was considered suitable to give this due consideration in the overall balance of judgement regarding the selection of sites for inclusion in the Shropshire Local Plan. It should be stressed that the proposed inclusion of this site in the draft Neighbourhood Plan was not related to the reason for the Plan's failure to reach the referendum stage.

- 1.10. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and MDR0039/043 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.11. Representations during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 and GC4o) did raise some objection to this site, principally from another site promoter of an omissions site arguing about the suitability of this site, especially as part of enabling development for the relocation of the sports facilities.
- 1.12. In conclusion, Shropshire Council considers that MDR0039/043 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. The combined site of MDR039/043 is allocated for residential development. This site area is 5.26 ha in size and the approximate site provision figure is 120 dwellings.
- 2.2. Detailed development guidelines within Schedule S11.1(i) of draft Policy S11.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S11.1(i) of draft Policy S11.1 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.



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

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

**Shropshire Council Response:**

- 4.1. The MDR039 element of the proposed allocation has been subject to two outline planning applications since 2022 both of which were for up to 100 dwellings (21/04307/OUT and 23/00089/OUT).
- 4.2. The Statement of Common Ground between Gladman and Shropshire Council (SoCG08) provided an overview of the first application, but the second one was largely similar in nature.
- 4.3. Outline permission was refused principally due to the insufficient weight being attached to the emerging Local Plan, in light of outstanding and unresolved objections to the Plan. The decision did not raise any site specific or technical issues. Section 3.2 of SoCG outlines points of agreement reached through the planning application process, despite the ultimate refusal.
- 4.4. A Planning Application (23/00089/OUT) was submitted in January 2023. Outline planning permission was refused on 31<sup>st</sup> May 2023 for two reasons; the first being the same reason as the original application concerning the weight to be afforded to the emerging Local Plan. The second reason cited insufficient information in relation to the potential noise implications for future occupiers of the proposed development.
- 4.5. The Council and the applicant agree that this does not constitute an insurmountable issue and it is one that can be addressed through the submission of additional evidence to a future application.

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

**Shropshire Council Response:**

- 5.1. MDR039/043 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 Market Drayton and other communities in the Place Plan area.

- 5.2. A further key benefit of the allocation is the proposed contribution the site will make to enabling the relocation of the Market Drayton Sports Facilities from their current site at Greenfields Lane, to a new proposed location north of the proposed site and identified on the Policies Map (sd00511-s11) as a '*broad location for the proposed relocation of the sports facilities*'. This enabling requirement is set out in Policy S11.1.
- 5.3. The requirement of the policy is to enable sufficient improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation sit, including the construction of a public footpath and cycleway along the northern edge of the site and improved traffic management, sufficient to enable access to both the residential allocation and the proposed future sports facilities.

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

**Shropshire Council Response:**

- 6.1. Stage 3 of the Council's site assessment provided comments from wider service areas. Whilst there were some doubt raised in comments by Council highway officers regarding the need to improve the section of road between Longford Turning and Shrewsbury Road, the two recent applications, although refused, did agree the principle of highway access into the site. Noise issues, resulting from the site's proximity to the A53 were also identified, and there is a need for further noise assessment information to be part of any future application on the site in line with the proposed development guidelines. This issue is not seen as insurmountable, and indeed the applicant has recently submitted additional noise assessment information to the Council for consideration.

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

**Shropshire Council Response:**

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

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

- 7.3 The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations.
- 7.4 With specific regard to flood risk at MDR039/043, in summary:
  - a. With regard to fluvial flood risk, the entire site falls within Flood Zone 1.
  - b. With regard to other sources of flood risk, around 3% of the site is located within the 30 and 100 year surface flood risk zones and around 8% of the site is located within the 1,000 year surface flood risk zone.
- 7.5 In lines with the Council's Sequential and Exception Test Assessment (EV094) the proposed site guidelines for MDR039/43 within Schedule S11.1(i) of draft Policy S11.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6 On this basis it concluded that the site MDR039/043 passed the sequential test and that there is no requirement for the exception test.
- 7.7 Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of MDR039/43 were considered within stage 3 of the site assessment process.
- 8.2. The draft site guidelines for MDR039/43 within Schedule S11.1(i) of draft Policy S11.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.

- 8.3. 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).
- 8.4. The site guidelines include:
- a. Enabling access into the proposed future sports relocation site to the north;
  - b. Improvements to the approach to the site from Shrewsbury Road to the underpass;
  - c. Green infrastructure buffering of the watercourse to the north of the site
  - d. Appropriate acoustic design to manage arising from the A53;
  - e. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.5. 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.
- 8.6. 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.
- 8.7. 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 MDR039/43 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), which confirms that for MDR039/43 that the site promoter has confirmed the site is suitable, viable and deliverable within the early part of the plan period. This is further supported by the submission of two applications on the site.

**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 MDR039/43 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 2030/31. The Council also anticipates that development will progress at a rate of 25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.

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

**Shropshire Council Response:**

- 11.1. Yes. There is no known justification for amending the boundary.

**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 MDR039/43 within Schedule S11.1(i) of draft Policy S11.1 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of MDR039/43; 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.
- 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 MDR039/43 – complementing the wider policy framework for managing development within the draft policies of the draft Shropshire Local Plan.
- 12.7. Shropshire Council considers these site guidelines are consistent with national policy. 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.

**Questions: Site Allocation HKW009 – Land at School Bank Road, Hinstock**

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

**Shropshire Council Response:**

- 1.1. This proposed allocation lies to the east of the village of Hinstock. It consists of part of a large agricultural field. It is bounded by School Bank and residential curtilages to the west and the extent of the proposed allocation within the larger agricultural field to north, east and south.
- 1.2. To inform the identification of proposed site allocations, including HKW009, 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 L (SD006.13) 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 Market Drayton 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 18 sites were considered at Hinstock. Within Stage 3 of the site assessment process, around 8 sites were considered at Hinstock.
- 1.11. HKW009 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 HKW009 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is not aware that any representations during the Regulation 19 Pre-Submission Consultation included objection to the site assessment process undertaken to identify proposed allocation HKW009. These representations are summarised in SD014.01 and GC4o.
- 1.14. In conclusion, Shropshire Council considers that HKW009 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. HKW009 is proposed to be allocated for residential development. This site is some 1.84ha in size and the approximate site provision figure is some 35 dwellings.
- 2.2. Detailed development guidelines within Schedule S11.2(i) of draft Policy S11.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S11.2(i) of draft Policy S11.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HKW009.

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

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

**Shropshire Council Response:**

- 4.1. No relevant planning application has been made in respect of this proposed site allocation.

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

**Shropshire Council Response:**

- 5.1. HKW009 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of HKW009 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 Hinstock and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include the ability to provide green infrastructure and open space – including buffers to mature trees and hedgerows on site.

- 5.5. More generally, it is also considered that development of HKW009 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 HKW009 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 HKW009.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HKW009 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 HKW009 within Schedule S11.2(i) of draft Policy S11.2 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. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
  - b. The site is located within a Grade 3 Source Protection Zone, as is all of Hinstock village and the land around it. Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in Source Protection Zones.
  - c. The site contains mature trees and hedgerows. As such, site guidelines require their retention and green infrastructure to form an appropriate green buffer. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - d. Site located adjacent to historic core of settlement, and of a medium size, so may have archaeological potential. As such, site guidelines require development to respect the sites location adjacent to the historic core of the village.

- e. Noise associated with the adjoining road. Site guidelines require acoustic design, layout, green infrastructure and appropriate building materials to appropriately manage arising noise.

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

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HKW009.
- 7.4. With specific regard to flood risk at HKW009, in summary:
  - a. With regard to fluvial flood risk, the proposed allocation is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, none of the proposed allocation is located within the surface flood risk zone.
- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including HKW009. It concluded that the site HKW009 passed the sequential test and that there is no requirement for the exception test.
- 7.6. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of HKW009 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 HKW009.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HKW009 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 HKW009 within Schedule S11.2(i) of draft Policy S11.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site.
  - b. Providing necessary improvements to the highway network.
  - c. Providing green infrastructure and open space – including buffers to mature 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 HKW009. 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 HKW009 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that correspondence appended to EV113 the site promoter stated, *"Yes the site is viable, against the requirements in the Reg. 19 draft local plan. The owners are in discussion with the Tenant farmer, and there is no reason to suggest the site is not deliverable."*

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation HKW009 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 2029/30 and continue until 2030/31. The Council also anticipates that development will progress at a rate of up to 20 dwellings per annum, reflecting the size of the site.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that correspondence appended to the Viability Topic Paper (EV113) the site promoter stated, *"Yes the site is viable, against the requirements in the Reg. 19 draft local plan. The owners are in discussion with the Tenant farmer, and there is no reason to suggest the site is not deliverable."*

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

**Shropshire Council Response:**

- 11.1. Shropshire Council considers the boundary for proposed allocation HKW009 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 HKW009.
- 11.3. The boundary for HKW009 is defined by School Bank and residential curtilages to the west and the extent of the proposed allocation within the larger agricultural field to north, east 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 HKW009 within Schedule S11.2(i) of draft Policy S11.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of HKW009; 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 HKW009.

- 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 HKW009 – 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 HKW009.
- 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 HKW009, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.



- 12.8. Shropshire Council is not aware of any representations during the Regulation 19 Pre-Submission Consultation that included significant objections to the specific site guidelines proposed for HKW009. These are summarised in SD014.01 and GC4o.

### **Questions: Site Allocation HHH001 & HHH014 – Land adjacent to the Primary school and The Grove, Hodnet**

**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 centrally within the village of Hodnet. It consists of one large agricultural field and part of another agricultural field. It is bounded by a belt of trees within the curtilage of the adjoining bowling club to the north, residential curtilages to the north-east, the extent of the proposed allocation within an agricultural field to the south-east, residential curtilages and The Grove to the south, and the curtilage of Hodnet Primary School and Shrewsbury Street to the west.
- 1.2. To inform the identification of proposed site allocations, including HHH001 & HHH014, 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 L (SD006.13) 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 Market Drayton Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.10. Within Stages 2a and 2b of the site assessment process, around 14 sites were considered at Hodnet. Within Stage 3 of the site assessment process, around 8 sites were considered at Hodnet.
- 1.11. HHH001 & HHH014 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 HHH001 & HHH014 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13. Shropshire Council is not aware of any representations to the Regulation 19 Pre-Submission Consultation that included specific objections to the site assessment process to identify proposed allocation HHH001 & HHH014, or the allocation itself. These representations are summarised in SD014.01 and GC4o.
- 1.14. In conclusion, Shropshire Council considers that HHH001 & HHH014 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. HHH001 & HHH014 is proposed to be allocated for residential development. This site is some 3.13ha in size and the approximate site provision figure is some 40 dwellings.
- 2.2. Detailed development guidelines within Schedule S11.2(i) of draft Policy S11.2 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.

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

**Shropshire Council Response:**

- 3.1. The proposed scale and type/mix of uses proposed and the associated development guidelines within Schedule S11.2(i) of draft Policy S11.2 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HHH001 & HHH014.

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

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

**Shropshire Council Response:**

- 4.1. No relevant planning application has been made in respect of this proposed site allocation.

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

**Shropshire Council Response:**

- 5.1. HHH001 & HHH014 is a proposed residential allocation. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area.
- 5.2. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of HHH001 & HHH014 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 Hodnet 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 provision of a focal open space, with mature trees and hedgerows retained and appropriately buffered.
- 5.5. More generally, it is also considered that development of HHH001 & HHH014 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 HHH001 & HHH014 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 HHH001 & HHH014.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HHH001 & HHH014 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 HHH001 & HHH014 within Schedule S11.2(i) of draft Policy S11.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified – a main modification is proposed to the guidelines relating to the historic environment and detailed in GC4m.
- 6.4. 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.
- 6.5. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to all the land around Hodnet. This has been appropriately considered within the site assessment.
  - b. The site contains and is in proximity of mature trees and hedgerows. As such, site guidelines require their retention and appropriate buffering. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. Site wholly within Hodnet Conservation Area, and potential impacts on Scheduled Monument of Motte and bailey castle on Castle Hill, and the associated remains of a park pale, a fishpond and a formal garden (NHLE ref. 1019653) and Grade II Registered Park and Garden of Hodnet Hall (NHLE ref. 1001125). Site guidelines require design and layout to be of a high quality and positively respond to its location (informed by recommendations of a Heritage Impact Assessment – which may

- include good quality timber joinery detailing and a palate of materials informed by, and in keeping with, the local vernacular).
- d. Noise associated with the adjoining club. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
  - e. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.
  - f. A small component of the site is located within the surface water flood risk zone. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.

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

**Shropshire Council Response:**

- 7.1. The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation HHH001 & HHH014.
- 7.4. With specific regard to flood risk at HHH001 & HHH014, in summary:
  - a. With regard to fluvial flood risk, the proposed allocation is located entirely within Flood Zone 1, the area with the lowest risk of flooding.
  - b. With regard to other sources of flood risk, around 1% of the proposed allocation is located within the 100 year surface flood risk zone and around 2% of the proposed allocation is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for HHH001 & HHH014 within Schedule S11.2(i) of draft Policy S11.2 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a*

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

- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including HHH001 & HHH014. It concluded that the site HHH001 & HHH014 passed the sequential test and that there is no requirement for the exception test.
- 7.7. Draft Policy DP21 specifically addresses flood risk, ensuring that this issue is appropriately considered for all development sites as part of the planning application process. It includes criteria which ‘trigger’ the need to undertake site specific Sequential and Exception Test Assessments.

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

**Shropshire Council Response:**

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of HHH001 & HHH014 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 HHH001 & HHH014.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that HHH001 & HHH014 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 HHH001 & HHH014 within Schedule S11.2(i) of draft Policy S11.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and

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

- 8.5. The site guidelines include:
  - a. Providing an appropriate access to the site off Shrewsbury Road and/or The Grove.
  - b. Providing necessary improvements to the highway network.
  - c. Providing a focal open space, with mature trees and hedgerows retained and appropriately buffered.
  - d. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of HHH001 & HHH014. 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 HHH001 & HHH014 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence appended to EV113 the site promoter stated, *"We also confirm that in terms of viability then there are no current concerns or anticipated challenges taking into account all aspects of the sites and also relying on current market evidence."*

**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 HHH001 & HHH014 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 2031/32 and continue until 2032/33. The Council also anticipates that development will progress at a rate of 20 dwellings per annum, reflecting the size of the site.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Shropshire Council would note that within correspondence appended to the Viability Topic Paper (EV113) the site promoter stated, *"We also confirm that in terms of viability then there are no current concerns or anticipated challenges taking into account all aspects of the sites and also relying on current market evidence."*

**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 HHH001 & HHH014 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 HHH001 & HHH014.
- 11.3. The boundary for HHH001 & HHH014 is defined by a belt of trees within the curtilage of the adjoining bowling club to the north, residential curtilages to the north-east, the extent of the proposed allocation within an agricultural field to the south-east, residential curtilages and The Grove to the south, and the curtilage of Hodnet Primary School and Shrewsbury Street 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 HHH001 & HHH014 within Schedule S11.2(i) of draft Policy S11.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of HHH001 & HHH014; 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 HHH001 & HHH014.
- 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 HHH001 & HHH014 – 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 HHH001 & HHH014.
- 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 HHH001 & HHH014, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
  - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
  - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
  - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
  - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
  - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
  - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8. Shropshire Council is aware that representation during the Regulation 19 Pre-Submission Consultation included comment on specific site guidelines proposed for HHH001 & HHH014. These are summarised in SD014.01 and GC4o.
- 12.9. Specifically, it was noted that the Development Guidelines for HHH001 & HHH014 include a requirement for a Heritage Impact Assessment and high-quality site design and layout. However, the Supplementary Site Assessment sets out several more detailed measures to ensure any residual harm to the Hodnet Conservation

Area and other heritage assets will be mitigated, such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular. Suggest the proposed Development Guidelines are strengthened by the inclusion of these additional measures in order to conserve and enhance the historic environment of Hodnet.

- 12.10. Shropshire Council is supportive of this proposal and an appropriate main modification has been proposed within GC4m.