

# Shropshire Local Plan Examination

**Shropshire Council Response to:**

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

**Matter 9**



## **Matter 9 - Bridgnorth Place Plan Area (policy S3) – see MMs 081-083**

***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 Bridgnorth Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Bridgnorth Place Plan area is established within draft settlement policies S3.1-S3.4, 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 Bridgnorth Place Plan area, the draft Shropshire Local Plan identifies Bridgnorth, Alveley, Ditton Priors and Neenton as locations to accommodate development. Specifically:
  - a. Bridgnorth is proposed to be identified as a Principal Centre where growth will respond to need in the town, its surrounding hinterland and contribute towards achieving strategic growth objectives in the east of the County, consistent with the requirements of Policy S3.1 and other relevant policies of the Shropshire Local Plan. Proposed development guidelines for Bridgnorth envisage the delivery of around 1,800 dwellings between 2016 and 2038 and that around 49ha<sup>1</sup> of employment

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<sup>1</sup> Please Note: This includes 16ha on proposed allocation BRD030; around 11.4ha on STC002 and P58a; 1.5ha on existing allocation W039; around 12.5ha on existing allocation ELR011/b a (around 6.6ha net of landscaping and drainage requirements) which is specifically allocated to accommodate the relocation of the existing livestock market (the site of which is allocated for residential development within the adopted Development Plan); and around 10.75ha on existing allocation ELR011/a (around 6.7ha net of landscaping and drainage requirements).

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

- b. Alveley and Ditton Priors are significant rural service centres, as such it is proposed they will be identified as Community Hubs where new development will respond to local needs consistent with Policy S3.2, Policy SP8, and other relevant policies of the Shropshire Local Plan.
    - i. Proposed development guidelines for Alveley envisage the delivery of around 130 dwellings between 2016 and 2038.
    - ii. Proposed development guidelines for Ditton Priors envisage the delivery of around 65 dwellings between 2016 and 2038.
  - c. Neenton is proposed to be identified as a Community Cluster where new development will respond to local needs, consistent with the requirements of Policy S3.3, Policy SP9, and other relevant policies of the Shropshire Local Plan. Due to the characteristics of this settlement, no specific development guideline or site allocations are proposed.
- 1.5. A Neighbourhood Plan area has been designated for Tasley Parish and work has commenced on the preparation of this Neighbourhood Plan. This will be in conformity with and support the implementation of the strategy for Bridgnorth and the wider Shropshire Local Plan.
- 1.6. In identifying site allocations to contribute to the achievement of the strategies proposed for Bridgnorth, Alveley and Ditton Priors, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
- 1.7. Through this process three proposed allocations are identified at Bridgnorth; two proposed allocations are identified at Alveley; and one proposed allocation is identified at Ditton Priors. The most recent iteration of this assessment work for Bridgnorth is summarised within Appendix 4 of GC44; and for Alveley and Ditton Priors is summarised within Appendix D (SD006.05) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01). The proposed site allocations are:
- a. BRD030 which constitutes a proposed Sustainable Urban Extension of Bridgnorth for residential, employment, a new local centre and extensive green infrastructure.
  - b. P58a which constitutes a proposed employment allocation as an extension to Stanmore Business Park near Bridgnorth.
  - c. STC002 which constitutes a proposed employment allocation as an extension to Stanmore Business Park near Bridgnorth.

- d. ALV006 & ALV007 which constitutes a proposed residential-led mixed use allocation to facilitate the provision of community facilities at Alveley.
  - e. ALV009 which constitutes a proposed residential allocation at Alveley.
  - f. DNP009 which constitutes a proposed residential allocation at Ditton Priors.
- 1.8. Furthermore, through this site assessment process, one proposed area of safeguarded land was identified at Alveley (Land off Cooks Cross, Alveley) to ensure the long term sustainability of the village. It is proposed that this area of safeguarded land would be removed from the Green Belt and safeguarded for future development beyond the proposed plan period.
- 1.9. In addition, to provide certainty about the ability to meet future development needs at Bridgnorth, which is partly inset within the Green Belt, a 41.5ha area of land outside the proposed development boundary has been identified as a potential future direction of growth for beyond the proposed plan period. This land is outside of the Green Belt and would remain open countryside, its future development dependent on its allocation within a future Local Plan.
- 1.10. The Bridgnorth Place Plan area generally has a strong functional relationship to the Black Country due to its geographic location, quality of main road links, and migration and commuting patterns. As a result, Bridgnorth was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.11. A robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options within the identified assessment geography – including Bridgnorth. Through this process, BRD030 was identified as an appropriate location to accommodate part of the proposed contribution to the Black Country. Specifically, it is proposed that BRD030 accommodate 600 dwellings of the proposed contribution to the Black Country. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 1.12. Shropshire Council considers that development proposals in the Place Plan area will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire; contribute to the achievement of sustainable development that meets the needs of all groups within the communities of the Place Plan area; and support the long-term sustainability of Shropshire.
- 1.13. Through the accommodation of part of the proposed contribution to the unmet housing need forecast to arise in the Black Country, they will also support the ability of the Black Country Authorities to meet their housing needs.

- 1.14. The Council considers the proposed approach to development in the Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
- 1.15. In particular, it is responsive to the conclusions of:
- a. Sustainability Appraisal and Site Assessment processes (SD006.01-SD006.22 and GC44).
  - b. The Hierarchy of Settlements (EV060).
  - c. Assessments of the characteristics of settlements, including the Market Town Profiles (most recent publications EV073.01-EV073.17).
  - d. Conclusions of infrastructure planning processes (most recent publication is GC54).
- 1.16. The Council considers the proposed approach to development in the 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.
- 1.17. 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 BRD030 – Tasley Garden Village, Bridgnorth**

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

### **Shropshire Council Response:**

- 1.1. This proposed allocation lies to the south-west of Bridgnorth on land outside the Green Belt. It primarily consists of a series of agricultural fields and agricultural complexes. It is bounded by the A458, a residential curtilage and existing employment allocations (which benefit from Planning Permission) to the north; Ludlow Road and residential curtilages to the east; and primarily agricultural field boundaries to the south and west.
- 1.2. To inform the identification of proposed site allocations, including BRD030, 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 4 of the additional Sustainability Appraisal (GC44). A more detailed summary of the assessment of development options in Bridgnorth is summarised within ED013.01.
- 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, Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. For the avoidance of doubt, the stage 3 site assessment process included consideration of whether a site is located within the Green Belt and if it is; the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.
- 1.10. To inform the identification of sites to accommodate proposed contributions to the Black Country, a similar site assessment process was undertaken, for a geography within which reasonable options to accommodate these contributions would be located. This assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 1.11. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bridgnorth Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation

18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.

- 1.12. Within Stages 2a and 2b of the site assessment process, around 50 sites were considered at Bridgnorth. Within Stage 3 of the site assessment process, around 35 sites were considered at Bridgnorth.
- 1.13. BRD030 was proactively promoted for residential development during the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.14. Proposals for the site were subject to and informed by Regulation 18 Plan-Making consultation (EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and BRD030 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15. Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter, which provide further information in support of this site.
- 1.16. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of BRD030 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
  - a. The site is unsustainable, unavailable (in multiple ownerships), undeliverable and unviable. Shropshire Council considers that the site is available and that sustainable development of it is both viable and achievable. SoCG07 and SoCG07a provide further certainty on these matters.
  - b. The site is subject to one or more constraints, including the ability to form an appropriate access, separation from existing built form caused by the A458, lack of links to the existing built form of Bridgnorth, landscape and visual sensitivity, loss of high-quality agricultural land, heritage and ecological impacts, noise and odour impacts, and mineral sterilisation. Shropshire Council considers the site assessment process included appropriate consideration of all potential constraints to development of the site. This site assessment process fully justifies the identification of BRD030 as a proposed allocation.
  - c. Infrastructure capacity impacts the suitability of and constrains the ability to develop the site. Such constraints include drainage; highways; public transport, park and ride, and active travel links (particular over the A458); broadband; and community facilities. Shropshire Council considers the site assessment process included appropriate consideration of potential infrastructure constraints and requirements associated with any development of the site. This site assessment process fully justifies the



identification of BRD030 as a proposed allocation. SoCG07 and SoCG07a provide further certainty on these matters.

- d. The site is too large and there is a lack of need/demand for this level of housing and employment. Shropshire Council considers the site assessment process unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies identification of BRD030 as a proposed allocation.
- e. The site would not represent a self-contained development and/or is separated from the existing community (particularly the town centre and existing employment). Shropshire Council considers site guidelines ensure any development of this site would ensure provision of on-site infrastructure to support the new and existing communities of Bridgnorth and ensure the site appropriately integrates into the existing built form and existing communities of Bridgnorth. These site guidelines have been informed by the site assessment process undertaken.
- f. The site would undermine relocation of the livestock building. Shropshire Council considers the relationship between this proposed allocation and the existing allocation to support the relocation of the livestock market was appropriately considered through the site assessment process. The Council would note that Outline Planning Permission (21/05023/OUT) has recently been granted for relocation of the livestock market as part of a wider development scheme.
- g. The site would have unacceptable cumulative impacts with saved SAMDev Plan allocations and wider development proposals across Shropshire. Shropshire Council considers the site assessment process included appropriate consideration of potential cumulative impacts of any development of this site and other development locations. This site assessment process fully justifies identification of BRD030 as a proposed allocation.
- h. The site performs poorly within Stage 2a of the Sustainability Appraisal of the draft Shropshire Local Plan and/or this assessment is incorrect. Shropshire Council considers Stage 2a of the site assessment process is proportionate and robust and that conclusions reached were appropriately considered, alongside other relevant information, within Stage 3 of the site assessment process.
- i. Lack of technical assessments to inform the proposed allocation. Particular assessments referenced included landscape and visual sensitivity, air quality, agricultural land, noise and odour. The site promoter prepared a number of technical assessments to inform their site promotion which have been given due consideration by the Council - SoCG07 and SoCG07a provide further information on these matters. Crucially, Shropshire Council considers the

draft Shropshire Local Plan is underpinned by a proportionate and robust evidence base which informed the site assessment process undertaken. This site assessment process was also informed by analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers. This site assessment process fully justifies the identification of BRD030 as a proposed allocation.

- j. Lack of consideration of alternative sites. Shropshire Council considers the site assessment process undertaken gives due consideration to all alternative sites at Bridgnorth. The assessment process undertaken is unambiguously summarised and conclusions reached explained. This site assessment process fully justifies the identification of BRD030 as a proposed allocation. The Council would note that there is a distinction between lack of consideration of alternative sites and disagreement about the outcomes of this consideration.

1.17. Shropshire Council is aware responses to the Post Stage 1 Interim Findings Consultation included both support and objection to the site assessment process which informed identification of BRD030 as an appropriate location to accommodate part of the proposed contribution to the unmet housing need forecast to arise in the Black Country. These responses are summarised in GC52.

1.18. Reasons for objections were often similar to those addressed in paragraph 1.16 of this response. Other reasons for objections included:

- a. The site was proposed for allocation to meet the needs arising in Bridgnorth and Shropshire as a whole, not the Black Country. To accommodate contributions to the Black Country on the site effectively reduces their contribution to addressing Shropshire's housing needs.
  - i. Shropshire Council considers the identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process which unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
  - ii. Shropshire Council would note the submission version of the draft Shropshire Local Plan included a proposed contribution of 1,500 dwellings towards the unmet housing needs, to be accommodated in Shropshire in accordance with the wider strategy within the draft Shropshire Local Plan.
  - iii. Shropshire Council would also note that as a proposed Principal Centre, Bridgnorth is intended to contribute towards

the urban focused development strategy and strategic growth objectives in the east of the County. As such, it is considered entirely appropriate for the settlement to accommodate part of the proposed contribution to the Black Country.

- b. There is a lack of justification for proposals to accommodate part of the housing contribution to the Black Country on BRD030. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process which unambiguously documents the assessment process undertaken and explains the conclusions reached. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
- c. Alternative sites are available that are more appropriate or have not been appropriately considered. Shropshire Council considers the site assessment process undertaken to inform identification of sites to accommodate proposed contributions to the Black Country considered all reasonable site options. The assessment process undertaken is unambiguously summarised and conclusions reached explained. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country. The Council would note that there is a distinction between lack of consideration of alternative sites and disagreement about the outcomes of this consideration.
- d. The site's location and accessibility to the Black Country (including modes of transport and travel times) means the site is not suitable to accommodate proposed contributions to the Black Country.
  - i. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process.
  - ii. The assessment process included identification of an appropriate assessment geography, informed by a range of factors including geographic proximity, location and connectivity, migration and commuting patterns, and travel to work areas.
  - iii. The assessments unambiguously documents the process undertaken and explains conclusions reached.
  - iv. The Council considers the site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.

- e. Migration/commuting trends between Shropshire and the Black Country mean the site is not suitable to accommodate proposed contributions to the Black Country.
    - i. Shropshire Council considers identification of sites to accommodate proposed contributions to the Black Country was informed by a proportionate and robust site assessment process.
    - ii. The assessment process included identification of an appropriate assessment geography, informed by a range of factors including geographic proximity, location and connectivity, migration and commuting patterns, and travel to work areas.
    - iii. The assessments unambiguously documents the process undertaken and explains conclusions reached.
    - iv. The Council considers the site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
  - f. Increased impact of development of the site on Bridgnorth and other nearby settlements (particularly their infrastructure) means the site is unsuitable to accommodate part of the proposed contribution to the Black Country. Shropshire Council considers that the site assessment process included appropriate consideration of potential infrastructure constraints and requirements associated with any development of the site. This site assessment process fully justifies identification of BRD030 as a proposed allocation to accommodate part of the proposed contribution to the Black Country.
- 1.19. In conclusion, Shropshire Council considers that BRD030 was identified through a proportionate and robust site assessment process which considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This site assessment process and the conclusions reached are effectively summarised in Appendix 4 of GC44.
- 1.20. Shropshire Council also considers that identification of BRD030 as a location to accommodate part of the proposed contribution to the unmet housing need forecast to arise in the Black Country was informed by a proportionate and robust site assessment process. This process considered all reasonable options for site allocations and was appropriately informed by consideration of relevant information. This process and conclusions reached are unambiguously summarised within Chapter 12 and Appendices 1-10 of GC44.

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

**Shropshire Council Response:**

- 2.1. BRD030 is around 75.5ha in size (excluding existing built form to be retained) and is proposed to be allocated as a mixed-use Sustainable Urban Extension. Proposed uses include 1,050 dwellings, 16ha of employment land, a new local centre, 20ha of green infrastructure and a 19ha linear park. 600 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 2.2. In addition, to provide certainty about the ability to meet future development needs at Bridgnorth, which is partly inset within the Green Belt, an area of land outside the proposed development boundary and adjoining this proposed site allocation (forming part of the wider site promotion) has been identified as a potential future direction of growth for beyond the proposed plan period. This land, which is outside the Green Belt, would remain open countryside and its future development would be dependent on its allocation within a future Local Plan.
- 2.3. For the avoidance of doubt, the 19ha linear park proposed as part of BRD030, as a use compatible with countryside locations, is expected to extend beyond the extent of the proposed allocation into the potential future direction of growth.
- 2.4. Detailed development guidelines within Schedule S3.1(i) of draft Policy S3.1 and the wider policies in the draft Shropshire Local Plan would provide the policy framework for development of the site.
- 2.5. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.6. The specific employment mix on the site would be particularly influenced by the development guidelines within Schedule S3.1(i) of draft Policy S3.1 and draft Policies SP1; SP2; SP13 and SP14 and the employment uses should principally be within the primary use classes of E(g), B8 and appropriate sui generis uses.

**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 S3.1(i) of draft Policy S3.1 have been informed by the proportionate and robust site

assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation BRD030.

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

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

**Shropshire Council Response:**

- 4.1. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site, with two Statements of Common Ground (SoCG07 and SoCG07a) completed between the Council and the site promoter. An Environmental Scoping Opinion (24/02859/SCO) has recently been sought in relation to the potential future development of this site.

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

**Shropshire Council Response:**

- 5.1. BRD030 is a proposed mixed-use allocation for 1,050 dwellings, 16ha of employment land, a new local centre, 20ha of green infrastructure and a 19ha linear park. 600 of the dwellings proposed on the site constitute part of the proposed contribution towards the unmet housing need forecast to arise in the Black Country.
- 5.2. As such, key benefits of the proposed development include:
  - a. The provision of housing to contribute to meeting the needs of all groups within the town and other communities in the Place Plan area. This includes the need for local employer and key worker housing.
  - b. Supporting the housing needs of the Black Country, through the accommodation of part of the proposed contribution to the unmet housing needs forecast to arise in the Black Country.
  - c. The provision of employment land in a gateway location and targeted towards office and research & development uses, providing employment opportunities for residents of the town and other communities in the Place Plan area. This will complement the employment opportunities in Bridgnorth and

contribute towards the objectives of the Shropshire Economic Growth Strategy.

- d. The provision of a new local centre comprising an appropriate range of retail and community uses.
  - e. The provision of a new linear park and extensive areas of other open space and green infrastructure.
- 5.3. Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for the development of BRD030 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 Bridgnorth and Shropshire.
- 5.4. The site's location, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the town.
- 5.5. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultation; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. Ensuring the comprehensive development of the site, including housing; employment in a gateway location; a new local centre comprising an appropriate range of retail and community uses; a new linear park and extensive areas of other open space; and other services, facilities and infrastructure. Non-residential development will form an intrinsic component of the development, occurring alongside and cross-subsidised by housing.
  - b. Ensuring development achieves garden village principles and complements the character of Bridgnorth, informed by a masterplan and design code.
  - c. Ensuring development maximises energy efficiency and achieves on-site renewable/low-carbon energy generation.
  - d. Providing 2ha of land for a new primary school on the site.
  - e. If required, providing land for a new medical centre on the site.
  - f. Safeguarding natural environment assets in proximity of the site and retaining and enhancing on-site mature trees, hedgerows, structural vegetation and key existing green infrastructure corridors.
  - g. Retaining non-designated heritage assets on the site and using green infrastructure to create appropriate settings for heritage assets.

- h. Retaining historic field patterns in the grain of the development.
  - i. Appropriately buffering noise from the A458, employment uses on/off site, and mineral activities in the surrounding area.
  - j. Providing necessary improvements to the highway network, including the A458 Ludlow Road roundabout.
  - k. Enhancing pedestrian, cycle and vehicular links to and through the site – particularly over the A458. This includes a footbridge crossing of the A458, subject to ground investigations and available land – further information provided in SoCG07a.
  - l. Enhancing public transport links to the site and investigating the potential to operate a dedicated park and ride service from the site, linked to the new local centre.
- 5.6. More generally, it is also considered that development BRD030 will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire. It would also support the ability of the Black Country to meet their housing needs.

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

**Shropshire Council Response:**

- 6.1. Potential adverse impacts of developing BRD030 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 BRD030.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BRD030 constituted an appropriate proposed mixed-use allocation; it was possible to achieve the sustainable development on the site; and that development of the site was viable and deliverable.
- 6.3. The draft site guidelines for BRD030 within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. Separation between the site and the built form of Bridgnorth caused by the A458.



- i. Site guidelines stipulate expectations for pedestrian and cycle links over the A458 (including a footbridge crossing, subject to ground investigations and available land – further information provided in SoCG07a) to encourage safe and sustainable patterns of movement between the site and the wider town.
  - ii. Site guidelines also outline expectations for services and facilities on the site. This includes 2ha of land for a new primary school, land for a new medical centre if required by the Integrated Care Board (ICB), a local centre comprising of an appropriate range of retail and community uses, and appropriate public transport links to the site – including investigation of the potential to operate a dedicated park and ride service.
- b. Location within the impact risk zone for Sites of Special Scientific Interest (SSSI), presence of an environmental network corridor along much of the western boundary and proximity of other environmental assets. Site guidelines require natural environment assets on and in proximity of the site to be safeguarded and appropriately buffered; mature trees, hedgerows, structural vegetation and key green infrastructure corridors to be retained and enhanced; and provision of extensive areas of open space – including a new linear park. Site guidelines also require incorporation of a multi-stage sustainable drainage system and water treatment facilities. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- c. Presence of mature trees and hedgerows on-site. Site guidelines therefore require mature trees, hedgerows, structural vegetation and key green infrastructure corridors to be retained and enhanced.
- d. Presence of heritage assets on-site and in proximity. Site guidelines require design and layout to reflect and respect the site's heritage and heritage assets within the wider area; listed and non-designated historic farm buildings to be retained; green infrastructure will create appropriate settings for identified heritage assets; and historic field patterns to be retained in green infrastructure and the grain of the development. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.
- e. Location within the Coal Authority reference area and mineral safeguarding area. This has been appropriately considered within the site assessment.
- f. Applying the precautionary principle, the site consists of best and most versatile agricultural land. However, this applies to the

majority of the land around Bridgnorth. This has been appropriately considered within the site assessment.

- g. A small component of the site is located within the fluvial flood zones 2 and/or 3, the surface water flood risk zones, and within proximity of a detailed river network. Site guidelines stipulate that development will be excluded from the portions of the site located in flood zones 2 and/or 3. They also require multi-stage sustainable drainage and stipulate any residual surface water flood risk areas will form part of the Green Infrastructure network.
- h. In the context of employment development, the site is deemed to have medium-high landscape and visual sensitivity. This has been appropriately considered within the site assessment. Furthermore, site guidelines include a range of expectations on site design and layout to ensure they positively respond to and mitigate this matter.
- i. Noise associated with the adjoining A458 and existing/proposed employment. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage any noise arising from these and other sources.
- j. Proximity to site allocations for employment development, including relocation of the livestock market. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage this relationship.
- k. Proximity to active quarries and an allocation to extend one of these quarries. Site guidelines require the layout of development, use of green infrastructure buffers and effective design and use of building materials to appropriately manage this relationship.
- l. Relationship to a site subject to a planning application for poultry units. This proposal was refused at appeal.

**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 BRD030.
- 7.4. With specific regard to flood risk across the entirety of the BRD030 site promotion, in summary:
  - a. With regard to fluvial flood risk, around 6% is located within Flood Zone 2 and around 5% within Flood Zone 3 (please note, flood zones 2 and 3 overlap). However, much of this component of the site is located within the potential future direction of growth.
  - b. With regard to other sources of flood risk, around 1% is located within the 30 year surface flood risk zone, around 4% is located within the 100 year surface flood risk zone, and around 7% is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for BRD030 within Schedule S3.1(i) of draft Policy S3.1 address this issue, stating *"The site will incorporate multi-stage sustainable drainage system features and water treatment facilities, informed by a sustainable drainage strategy. Water runoff will be restricted to the equivalent greenfield rate and water quality in the wider drainage network will be protected. 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 portions of the site located in Flood Zones 2 and/or 3. These areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."*
- 7.6. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including BRD030. It concluded that the site BD030 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 BRD030 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 BRD030.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BRD030 constituted an appropriate proposed mixed-use 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 BRD030 within Schedule S3.1(i) of draft Policy S3.1 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines include:
  - a. Ensuring a comprehensive mixed-use development that achieves garden village principles and complements the character of Bridgnorth, informed by a masterplan and design code. Housing should occur alongside and cross-subsidise employment, the local centre and green infrastructure (including new linear park).
  - b. Providing a new local centre comprising an appropriate range of retail and community uses.
  - c. Providing 2ha of land for a new primary school on the site.
  - d. If required, providing land for a new medical centre on the site.
  - e. Providing extensive areas of green infrastructure, including playing fields and a new linear park.
  - f. Retention and enhancement of trees, hedgerows, structural vegetation, key green infrastructure corridors and other key environmental assets on the site.

- g. Retention of existing field patterns within the grain of the development.
  - h. Retention of heritage assets on the site.
  - i. Providing a green infrastructure buffer to the A458, existing/proposed employment, mineral activities in the surrounding area, heritage assets on and in proximity of the site, and ecological assets on and in proximity of the site.
  - j. Retaining existing public rights of way to the site.
  - k. Providing appropriate accesses to the site.
  - l. Providing necessary improvements to the highway network including the A458 Ludlow Road roundabout.
  - m. Enhancing pedestrian, cycle and vehicular links to and through the site – particularly over the A458. This will include but not be limited to a raised pedestrian and cyclist footbridge crossing of the A458 at an appropriate location near the Ludlow Road roundabout, subject to ground investigations and available land.
  - n. Enhancing public transport links to the site and investigating the potential to operate a dedicated park and ride service from the site, linked to the new local centre.
  - o. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.
- 8.6. Shropshire Council expects infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter. They address key infrastructure requirements and demonstrate the site is viable and deliverable.
- 8.8. In particular, paragraph 1.32 of SoCG07a includes *"The economic viability of the site has been reviewed and it is agreed that the development is economically viable and capable of delivering the required infrastructure having regard to the proposed site guidelines and proposed requirements of the policies of the draft Shropshire Local Plan."*
- 8.9. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of BRD030. This includes ensuring the delivery of the infrastructure necessary to support the development and appropriate management of any site constraints.
- 8.10. 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.

- 8.11. 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 BRD030 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would also note that within their Regulation 19 consultation response (reference A0609), the promoters of BRD030 state *"Tasley Garden Village is an available, suitable and deliverable site and therefore the inclusion in the draft Local Plan Review is fully supported."* They also state, *"Taylor Wimpey proposes to comply with the required/proposed affordable housing requirement set out within Policy DP3 of the Local Plan Review within Tasley Garden Village"* and *"Taylor Wimpey can confirm that Tasley Garden Village would be a policy compliant development and deliver all the necessary requirements on site."*
- 9.4. The Development Statement submitted as part of this Regulation 19 Representation states *"Taylor Wimpey has reviewed the economic viability of the site and proposals in terms of land values, market attractiveness/demand sales rates and development costs and can confirm that the development is economically viable and capable of delivering the required infrastructure."*

- 9.5. Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter, which provide further confidence on the viability and deliverability of the site.
- 9.6. In particular, paragraph 1.32 of SoCG07a includes *"The economic viability of the site has been reviewed and it is agreed that the development is economically viable and capable of delivering the required infrastructure having regard to the proposed site guidelines and proposed requirements of the policies of the draft Shropshire Local Plan."*

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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation BRD030 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2037/38. The Council also anticipates that development will progress at a rate of up to 90 dwellings per annum, recognising the scale of the site and the number of potential outlets.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.4. Two Statements of Common Ground (SoCG07 and SoCG07a) have been completed between Shropshire Council and the site promoter, which provide further confidence on the viability and deliverability of the site.
- 10.5. Within SoCG07a paragraph 1.33 stipulates that *"There is broad agreement between the parties regarding the housing delivery trajectory for the site; although Bloor and Taylor Wimpey consider that development on the site will be delivered quicker than Shropshire Council's assumptions."*
- 10.6. An Environmental Scoping Opinion (24/02859/SCO) has recently been sought in relation to the potential future development of this site.

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

**Shropshire Council Response:**

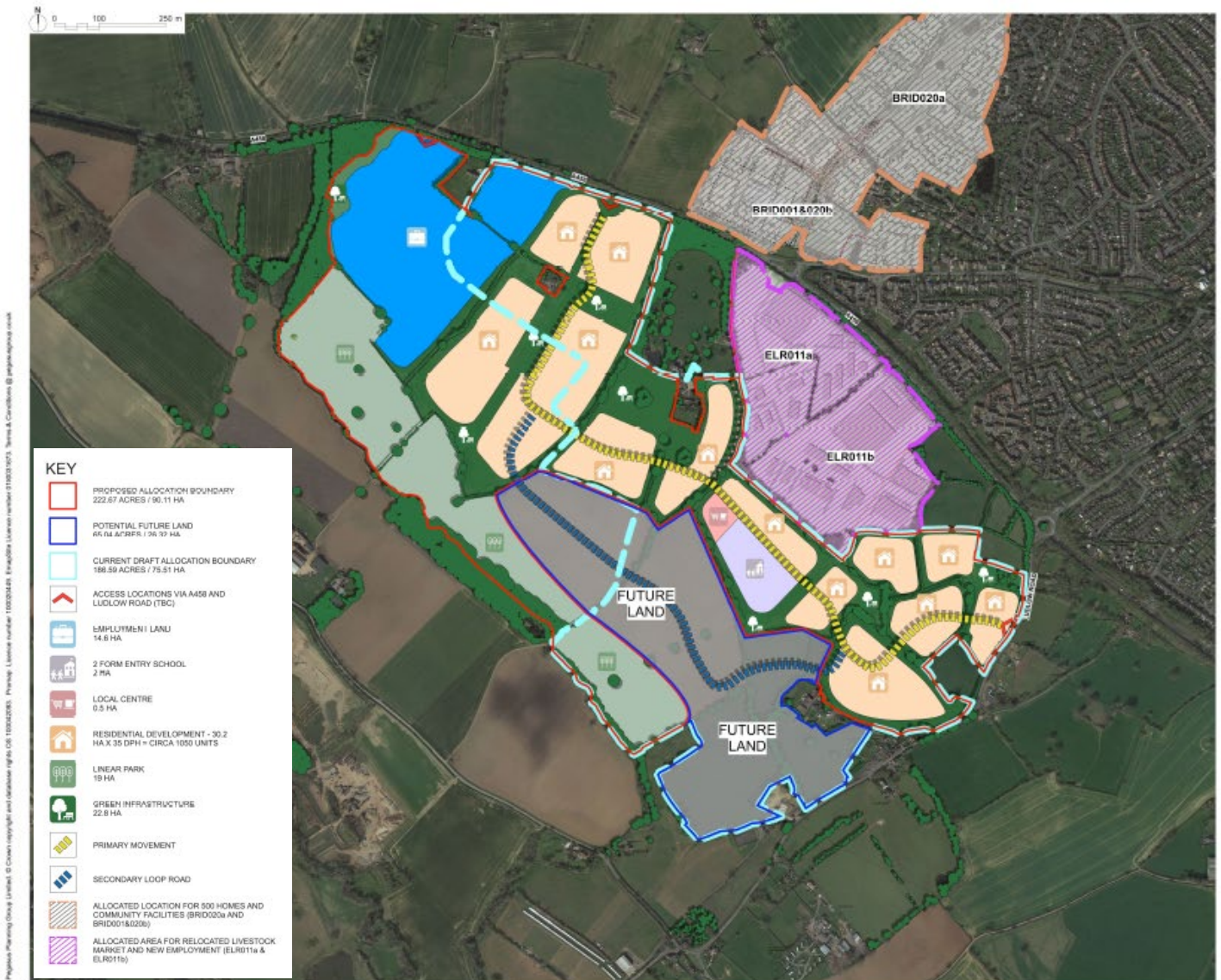
- 11.1. The boundary proposed for BRD030 was informed by initial masterplanning undertaken by the site promoter (which formed part of the material prepared in support of the promotion of this site), duly considered by the Council through its site assessment process.
- 11.2. The proposed site guidelines for BRD030 within Schedule S3.1(i) of draft Policy S3.1 require a more comprehensive masterplanning process to be undertaken to inform any future planning application and development of the site.
- 11.3. Consistent with this expectation, the site promoter has progressed a more comprehensive masterplanning exercise, to inform the potential sustainable development of the site - achieving proposed site guidelines, achieving wider policy requirements, and responding to the change in land control and implications for future phasing of development. This process has been informed by positive dialogue with Shropshire Council.
- 11.4. Within the Statement of Common Ground (SOCG07a) between the Council and the site promoter it was agreed in paragraph 1.6 that *"through the ongoing masterplanning process consideration is being given to the design, layout and the suitable phasing of development and infrastructure delivery. In the event that both parties agree that the ongoing masterplanning process identifies an opportunity to improve the development through an amendment to the proposed Tasley Garden Village allocation boundary, an appropriate main modification to the Plan could be proposed."*
- 11.5. Through the consideration of design, layout and the suitable phasing of development and infrastructure delivery within the more comprehensive masterplanning process, the site promoter has identified a proposed amendment to the allocation boundary for BRD030.
- 11.6. They consider this would allow for the achievement of a number of benefits, whilst still achieving the same quantum of development and retaining a potential future direction of growth (thereby providing confidence in the ability to achieve development needs in the longer term).
- 11.7. Specifically, the site promoter considers the benefits of their proposed amendment to the allocation boundary for emerging allocation BRD030 include:
  - a. Achieving a more effective layout - enhancing the relationship between housing, employment and the linear park.



- b. Allowing for the early delivery of infrastructure.
- c. Allowing for employment to be located in a more visually prominent location, with greater flexibility for end-users and greater separation from heritage assets.
- d. Providing greater certainty regarding the location of the linear park.
- e. Allowing for two independent accesses onto the A458, one to serve housing and the other to serve employment.

11.8. Figure 11.1 illustrates the site promoters proposed amendment to the allocation boundary for emerging allocation BRD030.

**Figure 11.1: Site Promoters Proposed Amendment to the Allocation Boundary for BRD030**



- 11.9. Shropshire Council has considered the more comprehensive masterplanning undertaken by the site promoter and understands the logic of and potential benefits associated with the proposed amendment to the proposed allocation boundary for BRD030.
- 11.10. As such, the Council is supportive of a proposed main modification to amend the allocation boundary for BRD030 to reflect the outcome of this more comprehensive masterplanning - as identified in Figure 11.1. This would result in an increase to the extent of the site to around 90ha, primarily to reflect the intention to incorporate the entirety of the linear park into the proposed allocation.
- 11.11. Associated main modifications would also be required regarding the location and extent of the potential future direction of growth, which would be reduced to around 26.5ha, primarily to reflect the intention to incorporate the entirety of the linear park into the extent of the proposed allocation.
- 11.12. These proposed main modifications would also provide an opportunity to detail the general location of housing, employment, the local centre, and the linear park proposed on the site.
- 11.13. Importantly, this proposed main modification would **not** result in an amendment to the quantum of development proposed on the site or the expectation that the site achieves compliance with the site guidelines within Schedule S3.1(i) of draft Policy S3.1 and the requirements of wider policies in the draft Shropshire Local Plan.

**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 BRD030 within Schedule S3.1(i) of draft Policy S3.1 are effective, justified and consistent with national policy (subject to main modifications proposed within GC4m).
- 12.2. However, Shropshire Council recognises that consistent with the draft site guidelines, the site promoter has undertaken more comprehensive masterplanning to inform the potential sustainable development of the site - achieving proposed site guidelines, achieving wider policy requirements, and responding to the change in land control and implications for future phasing of development. It is also recognised that this process will involve engagement with the community and Shropshire Council.
- 12.3. On balance, the Council considers this constitutes an appropriate process to inform proposals for the site. As such, the Council would

support a main modification to the relevant draft site guideline as follows:

*The development of this site will be in accordance with a vision, design code and masterplan which will be prepared in consultation with the public and ~~adopted as a Supplementary Planning Document~~ **approved** by Shropshire Council. This will represent a significant material planning consideration and must be completed before **granting** any planning application for development of the site.*

- 12.4. Site guidelines within Schedule S3.1(i) of draft Policy S3.1 address the key requirements and considerations for the development of BRD030; which alongside the draft policies in the draft Shropshire Local Plan, provide the framework to ensure the achievement of the sustainable development of the site.
- 12.5. Shropshire Council considers these site guidelines are justified as they were informed by the site assessment process undertaken to inform the identification of proposed allocations. The Council would also note that it considers that these guidelines would remain appropriate for site subject to the amended site boundary proposed – the entirety of which was included within the site subject to the site assessment process undertaken.
- 12.6. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation BRD030.
- 12.7. 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).
- 12.8. These guidelines have also been subject to and informed by Regulation 18 Plan-Making and Regulation 19 Pre-Submission consultation.
- 12.9. Shropshire Council considers these site guidelines are effective as they provide clear expectations for the development of BRD030 – 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 BRD030.
- 12.10. 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 BRD030, 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.

12.11. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections and support for specific site guidelines proposed for BRD030. These are summarised in SD014.01 and GC4o. Dealing with main objections in turn:

- a. Greater clarity required regarding the process for preparing an SPD for the site and implications for development timescales. Shropshire Council has proposed a further main modification on this matter above.
- b. Important sufficient flexibility is provided regarding the types of employment to support delivery. Shropshire Council considers the guidelines are sufficiently flexible, targeting employment provision towards office and research & development uses, but allow other suitable employment uses where they conform with the wider policies of the draft Shropshire Local Plan, particularly draft Policy SP12.
- c. The proposed local centre should be designated in the retail hierarchy to assist delivery. Shropshire Council does not consider it is necessary or appropriate for this proposed local centre to be designated within the retail hierarchy. This ensures appropriate consideration of the impact of any proposals for this local centre on Bridgnorth town centre.

- d. Delivery of the local centre should not be linked to the first phase of development. Shropshire Council considers this expectation is appropriate and recognises the importance of providing services and facilities early within a development of this scale.
- e. A pedestrian footbridge on desire lines is not achievable. Shropshire Council considers this requirement is appropriate and achievable. The requirement is for a footbridge over the A458 to be provided an appropriate location near Ludlow Road roundabout, subject to ground investigations and available land. Further information on achievability is provided in SoCG07a.
- f. Condition regarding closure of poultry units is not effective or necessary. This proposal was refused at appeal and as such the Council has proposed a main modification to delete this requirement within GC4m.
- g. Amount of on-site renewable and low-carbon energy generation should not be established in these guidelines. Shropshire Council considers this requirement is appropriate and consistent with draft Policy DP11.
- h. Recommend any Planning Application is accompanied by a heritage statement and archaeological assessment. Shropshire Council supports this principle and has proposed a main modification on this matter within GC4m.
- i. Retention of non-designated historic farm buildings is not justified and the guideline is too imprecise. Shropshire Council considers this requirement is appropriate, consistent with the conclusions of the site assessment process and consistent with wider draft Policies in the draft Shropshire Local Plan. Those buildings which do and do not constitute non-designated heritage assets on the site will be determined during any future Planning Application process, informed by appropriate technical assessments and comments from relevant statutory consultees. However, for clarity the Council has proposed a main modification to amend reference from non-designated historic farm buildings to non-designated heritage asset within GC4m.
- j. Green infrastructure should 'safeguard' rather than 'create' settings for historic assets. Shropshire Council supports this clarification and an appropriate main modification is proposed within GC4m.
- k. Guidelines should require demonstration of how playing fields and associated facilities will be managed and maintained. Shropshire Council supports this clarification, which is consistent with the requirements of draft Policy DP16. An appropriate main modification is proposed within GC4m.

- I. Flexibility required to allow off-site provision of open space to meet needs. Shropshire Council supports this clarification and an appropriate main modification is proposed within GC4m.

**Questions: Site Allocation ALV006 & ALV007 – Land north of Daddlebrook Road and west of A442, Alveley**

**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 ALV006 & ALV007 lies to the north eastern entrance of the village of Alveley. There is no boundary between ALV006 & ALV007 and it is effectively a single greenfield site located within Green Belt in the adopted Development Plan. The site directly adjoins the built up edge of Alveley with established residential development to the west. To the east the site is bounded by the A442 Bridgnorth Kidderminster Road and to the south the whole site fronts onto and is bounded by Daddlebrook Road. There is a hedgerow boundary to the North.
- 1.2. To inform the identification of proposed site allocations, including ALV006 & ALV007, 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 D (SD006.05) 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, Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. For the avoidance of doubt, the stage 3 site assessment process included consideration of whether a site is located within the Green Belt and if it is; the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bridgnorth Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.

- 1.11. Within Stages 2a and 2b of the site assessment process, around 21 sites / combinations of sites were considered at Alveley. Within Stage 3 of the site assessment process, around 20 sites were considered at Alveley.
- 1.12. ALV006 & ALV007 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and ALV006 & ALV007 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objections to the site assessment process undertaken and identification of ALV006 & ALV007 as a proposed allocation. These objections are summarised in SD014.01 and GC4o. They included:
  - a. Underlying Green Belt assessment process inconsistent and not appropriate: Shropshire Council considers that the supporting Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08) uses a consistent and robust methodology which clearly sets out how sites have been assessed and the conclusions reached. The site assessment process summarises the conclusions reached and fully justifies identification of ALV006 & ALV007 as a proposed allocation.
  - b. The site development could have unacceptable cumulative impacts alongside other development. Infrastructure capacity and service improvements required to support development: Shropshire Council considers the site assessment process included appropriate consideration of potential infrastructure constraints and requirements associated with any development of the site. Specific infrastructure requirements are addressed by proposed site guidelines within Schedule S3.2(i) of draft Policy S3.2 and other Local Plan policy provisions including proposed policy DP25.
  - c. Undue weighting given to community benefit which may not be realised to support Green Belt release: Shropshire Council expects that the site will deliver housing to meet the needs of the community and deliver community benefits, as detailed within proposed site guidelines within Schedule S3.2(i) of draft Policy S3.2. This is addressed further in the paragraphs that follow.



- 1.15. Shropshire Council is also aware that responses to the Post Stage 1 Interim Findings Consultation included objections to the site assessment process and proposed allocation of ALV006 & ALV007. These responses are summarised in GC52.
- 1.16. They primarily related to concerns about inconsistency between proposed site development guidelines in S3.2(i) and the latest proposals by the relevant community groups for the sale of the ALV006 & ALV007 for residential development to fund a new multi-purpose facility on the existing site of the social club and village hall. Additionally, some respondents raise doubts regarding the need for the sports and recreation provision facilities and/or additional housing provided by the site.
- 1.17. The approximate housing guideline for the site reflects its allocation for a mixed-use development scheme, incorporating market housing to enable community facility provision. This was informed by engagement early in the plan making process with the site promoters, which proposed a mixed-use scheme to provide a replacement club building and community sports and recreation facilities (with supporting infrastructure such as car parking). This was to replace and enhance the more limited provision that currently exists at Alveley Sports Club on the other side of Daddlebrook Road as stated in the draft site allocation guidelines.
- 1.18. Whilst not subject to proposed allocation the site of the existing sports club building, which lies within the village boundary and area inset within the Green Belt, may also have provided an opportunity for residential redevelopment.
- 1.19. There has been no formal submission by the site promoters in response to most recent Post Stage 1 Interim Findings Consultation. However, the Council are aware, as highlighted by consultation responses, that the promoter is considering a redistribution of uses across the proposed allocation and the site of the existing sports club building, so as to utilise residential only development on ALV006 & ALV007 to cross-subsidise a scaled down scheme for the enhancement / replacement of community facilities, to also include a replacement village hall facility, within the existing site (this site lies directly opposite ALV006 & ALV007, across Daddlebrook Road within the village boundary).
- 1.20. However, as no planning application or other advanced formal scheme has been submitted to the Council for consideration, the Council's position is that the proposed site guidelines for ALV006 & ALV007 detailed within Schedule S3.2(i) of draft Policy S3.2 remain appropriate. The Council also continues to consider the Green Belt exceptional circumstances detailed within EV51 remain relevant.

- 1.21. In conclusion, Shropshire Council considers that ALV006 & ALV007 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. ALV006 & ALV007 is proposed to be allocated for a mixed-use development including community facilities, recreational facilities, and residential development. This site is some 2.4ha in size and the approximate site provision figure is some 35 dwellings.
- 2.2. Detailed development guidelines within Schedule S3.2(i) of draft Policy S3.2 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 also 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 S3.2(i) of draft Policy S3.2 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 ALV006 & ALV007.
- 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 as presented in the submitted plan and set out in Draft Policy S3.2 and associated development guidelines within Schedule S3.2(i), 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 planning application has been made in respect of the proposed residential or other uses proposed by the site allocation.

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

**Shropshire Council Response:**

- 5.1. ALV006 & ALV007 is proposed to be allocated for a mixed use including community facilities and residential development. As such, the provision of infrastructure and improved facilities for community use, as well residential development to meet local housing needs are key benefits.
- 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 ALV006 & ALV007 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 Alveley and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Providing for comprehensive development of ALV006/007 as a single site with a high quality scheme recognising its important gateway location and relationship with Green Belt. Also, capitalising on its potential to help integrate other recent development into the village.
  - b. Delivering an integrated, mixed used scheme to provide enhanced local community facilities together with a mix of housing which reflects local needs.
  - c. Provision of a pedestrian crossing to provide pedestrian access to services and facilities in the village.

- d. Potential enhancement of the environmental network, as well as reinforcing Green Belt boundaries, with additional planting, including through tree and hedgerow planting to enhance northern and eastern boundaries, as well as the retention of mature trees and hedgerows.
- 5.5. More generally, it is also considered that development of ALV006 & ALV007 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 ALV006 & ALV007 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 ALV006 & ALV007.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that ALV006 & ALV007 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 ALV006 & ALV007 Schedule S3.2(i) of draft Policy S3.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
  - a. The site has mature trees and hedgerows and potential ecological interest, with a need to protect and restore the environmental network in that locality. As such, site guidelines require the design and layout of development to seek to retain mature and significant trees and hedgerows, and planting to be enhanced. The guidelines also seek that opportunities be taken to link green infrastructure from the site to the wider network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - b. There is a modest level of known surface water flood risk which can be accommodated by the design, layout of and access to the

development. Site guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network.

- c. Relationship of residential element to the adjoining A442 road within the mixed use scheme site guidelines is addressed by layout and design requirements. Furthermore, draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- d. The site ALV006 & ALV007 is within the Green Belt. The Green Belt Review undertaken for Shropshire indicates that this site is located within a Green Belt parcel, the release of which would have a low-moderate level of harm on the Green Belt. However, a sub-parcel fully encapsulating site ALV006 & ALV007 was assessed as having a low level of harm if released from Green Belt. Further details of the Green Belt Assessment and Review and potential mitigation and enhancement of beneficial use are set out in Green Belt Assessment and Review (EV049.01- EV049.05 and EV050.01-EV050.08), with a summary of potential compensatory improvements to the Green Belt in the Green Belt Revised Exceptional Circumstances paper EV051.
- e. Site guidelines include requirements for high-quality layout and design, to reinforce Green Belt boundaries and that opportunities should be taken to link green infrastructure from the site to the wider Green Belt and scope for other improvements to the environmental quality and accessibility explored.
- f. The site ALV006 & ALV007 is within an area of medium landscape sensitivity and medium visual sensitivity for housing. This has been appropriately considered within the site assessment. Site guidelines recognise the need to take this into account through high quality site design.
- g. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Alveley.

**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 ALV006 & ALV007.
- 7.4. With specific regard to flood risk at ALV006 & ALV007, in summary:
  - a. With regard to fluvial flood risk, proposed allocation ALV006 & ALV007 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 site ALV006 is located within the 1,000 year surface flood risk zones and around 8% of proposed allocation ALV007 is located within the 1,000 year surface flood risk zone.
- 7.5. The proposed site guidelines for ALV006 & ALV007 within Schedule S3.2(i) of draft Policy S3.2 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 ALV006 & ALV007. It concluded that the site ALV006 & ALV007 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 ALV006 & ALV007 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 ALV006 & ALV007.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that ALV006 & ALV007 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 ALV006 & ALV007 within Schedule S3.2(i) of draft Policy S3.2 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) Green Belt Assessment EV049.01 & EV049.02; Green Belt Review EV050.01 - EV050.08.
- 8.5. The site guidelines include:
  - a. Development of the site for mixed use with housing and community facilities.
  - b. Provision of a pedestrian crossing to enhance pedestrian access to services and facilities in the village.
  - c. Providing green infrastructure links between the site and the wider area.
  - d. Protection and enhancement of environmental network.
  - e. Reinforcing Green Belt boundaries with additional planting
  - f. Retention and enhancement of trees and hedgerows on the site.
  - g. Providing sustainable drainage and incorporating any residual areas of surface water flood risk into the green infrastructure network.

- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of ALV006 & ALV007. 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 ALV006 & ALV007 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).



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

**Shropshire Council Response:**

- 10.1. Expected timescales and rates of development on proposed allocation ALV006 & ALV007 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 residential development of the site will commence in 2031/32 and continue until 2032/33. The Council also anticipates that residential element of development will progress at a rate of around 15-20 dwellings per annum.
- 10.3. Given the lack of any submitted planning application for ALV006 & ALV007, 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 ALV006 & ALV007 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 ALV006 & ALV007.
- 11.3. ALV006 & ALV007 is well contained. The boundary for ALV006 & ALV007 is defined by a hedgerow boundary to its north western side; existing residential development to the south west boundary; and Daddlebrook Road to the south east frontage and the A442 to the north eastern boundary. The site adjoins existing residential development to its western side and lies opposite other residential development and community buildings. It would therefore form a natural extension to the existing built up area of the village.
- 11.4. The Green Belt Review (EV050.01 - EV050.08) undertaken for Shropshire indicates that this site is located within Green Belt parcel (P70), the release of which would have a low-moderate level of harm on the Green Belt. The site ALV006 & ALV007 is however within a sub-parcel of the larger assessed parcel P70. This sub

parcel adjoins the existing settlement edge and was identified to have a low level of harm if released. The sub parcel (which extends beyond ALV006 & ALV007) is described as a field which has strong urban fringe characteristics as it is contained by built development on three sides, including the A road running along the eastern 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 ALV006 & ALV007 within Schedule S3.2(i) of draft Policy S3.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of ALV006 & ALV007; 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 ALV006 & ALV007.
- 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); Green Belt Assessment EV049. 01 & EV049.02; Green Belt Review EV050.01 & EV050.08; 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 ALV006 & ALV007 – 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 ALV006 & ALV007.

- 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 ALV006 & ALV007, 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 aware representations during the Regulation 19 Pre-Submission Consultation included indirect objections to the specific site guidelines proposed for ALV006 & ALV007. These are summarised in SD014.01 and GC4o.
- 12.9. Representations identified that it was unclear how greater access to the Green Belt can be achieved. Shropshire Council considers that the Green Belt Revised Exceptional Circumstances paper EV051 identifies potential compensatory improvements and site guidelines include that scope for improvements to environmental quality and accessibility are explored.
- 12.10. Representations also questioned the validity of allocation of ALV006 & ALV007 based on community benefit if this is not delivered, community need for additional recreational facilities and housing and supporting evidence in relation to green belt. The mix of uses forms part of the site guidelines and Shropshire Council considers, as indicated in response to Questions 1 and 3, that the proposed development strategy for Alveley, including proposed allocations is sustainable, effective and deliverable.

## **Questions: Site Allocation ALV009 – Land adjacent to The Cleckars, Alveley**

**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 ALV009 is a roughly rectangular parcel of land which lies in Green Belt to the south east of Alveley village off the A442. It sits between the built up extent of the village and The Cleckars. ALV009 it is predominately agricultural in character, partly enclosed by hedgerows with boundaries formed by the existing residential area and the A442 road to the northern and eastern sides, respectively.
- 1.2. To inform the identification of proposed site allocations, including ALV009, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
  - b. *Availability:* Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site

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

- c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8. Stage 3 of the site assessment process was informed by:
  - a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9. For the avoidance of doubt, the stage 3 site assessment process included consideration of whether a site is located within the Green Belt and if it is; the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bridgnorth Place Plan area. These mechanisms included a formal call for sites, acceptance of site promotions during the five Regulation 18 Plan-Making consultations, consideration of planning application records, and consideration of land owned by the public sector.
- 1.11. Within Stages 2a and 2b of the site assessment process, around 21 sites / combinations of sites were considered at Alveley. Within

Stage 3 of the site assessment process, around 20 sites were considered at Alveley.

- 1.12. ALV009 was proactively promoted for residential development through the plan-making process and ultimately identified as a proposed allocation through the site assessment process.
- 1.13. Proposals for the site were subject to and informed by two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and ALV009 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14. Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included comments on and objections to the site assessment process undertaken to identify proposed allocation ALV009. These objections are summarised in SD014.01 and GC4o. They included:
  - a. Underlying Green Belt assessment process inconsistent/inappropriate: Shropshire Council considers that the supporting Green Belt Assessment and Review evidence (EV049.01-EV049.05 and EV050.01-EV050.08) uses a consistent methodology and clearly sets out how sites have been assessed and the conclusions reached. The site assessment process summarises the conclusions reached and fully justifies identification of ALV009 as a proposed allocation.
  - b. Lack of need for housing and the site development could have unacceptable cumulative impacts alongside other development proposed by the draft plan. Infrastructure capacity and service improvements required to support development: Shropshire Council considers the site assessment process justifies identification of ALV009 as a proposed allocation. The site assessment process included appropriate consideration of potential infrastructure constraints and requirements associated with any development of the site. Specific infrastructure requirements are addressed by proposed site guidelines within Schedule S3.2(i) of draft Policy S3.2 and other Local Plan policy provisions including proposed policy DP25.
  - c. Green Belt considerations have not adequately been taken into account in identifying the site and unclear how greater access to the Green Belt can be achieved: Shropshire Council considers national policy relating to Green Belt has been taken into account and exceptional circumstances are identified for Green Belt boundary changes as set out in EV051 and this also identifies potential compensatory improvements.

d. Proposed allocation ALV009 should be removed on the basis of site constraints, including ecological and hydrological issues, which have not adequately been taken into account. It is indicated that the site is adjacent to groundwater springs/issues, therefore groundwater is likely to be shallow and contaminated land, foundation dewatering and surface water management aspects will need consideration; Shropshire Council considers that Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development. Shropshire Council submits that it has appropriately considered ecological issues in its site assessment process and reflected constraints in site guidelines. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.

1.15. Shropshire Council is also aware that responses to the Post Stage 1 Interim Findings Consultation included objections to the site assessment process and proposed allocation of ALV009. These responses are summarised in GC52. Respondents raise doubts regarding the need to remove the site from the Green Belt for housing provision, also identifying that the site is not well connected to the village with a dangerous access. It is also identified that release would have a negative impact on local character, the environment and the role of green belt. It is also suggested better alternative sites are available: Shropshire Council considers the site assessment process included appropriate consideration of potential benefits and impacts of any development of this site and Green Belt as set out in the responses above.

1.16. In conclusion, Shropshire Council considers that ALV009 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. ALV009 is proposed to be allocated for a residential development. This site is some 1.34 ha in size and the approximate site provision figure is some 35 dwellings.

2.2. Detailed development guidelines within Schedule S3.2(i) of draft Policy S3.2 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 also 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 S3.2(i) of draft Policy S3.2 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 ALV009.
- 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 planning application has been made in respect of the proposed residential allocation of the site.

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

**Shropshire Council Response:**

- 5.1. ALV009 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 ALV009 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 Alveley and Shropshire.

- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into the village of Alveley and complements the village gateway and Green Belt edge location.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
  - a. Providing for high quality scheme for the development of ALV009 recognising relationship with Green Belt and gateway location.
  - b. Delivering a mix of housing which reflects local needs.
  - c. The introduction of an extended 30 mph zone and other potential traffic calming measures.
  - d. Provision of a footway to provide pedestrian access.
  - e. Protection of public right of way and linkage to wider network.
  - f. Retention of protected and mature trees and hedgerows and safeguarding of ecological interest.
  - g. Additional planting to reinforce boundaries, improve biodiversity, and minimise and mitigate visual encroachment into Green Belt with linkage of site green infrastructure to wider Green Belt.
- 5.5. More generally, it is also considered that development of ALV009 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 ALV009 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 ALV009.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that ALV009 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 ALV009 within Schedule S3.2(i) of draft Policy S3.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated:
- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The site has mature trees and hedgerows and potential ecological interest, with a need to protect adjacent priority habitat. As such, site guidelines require the design and layout of development to seek to retain mature and significant trees and hedgerows, and additional planting. The guidelines also seek that opportunities be taken to link green infrastructure from the site to the wider network. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - b. It is identified that the site is adjacent to groundwater springs/issues, therefore groundwater is likely to be shallow and contaminated land, foundation dewatering and surface water management aspects will need consideration. Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in this circumstance.
  - c. The site ALV009 is within the Green Belt. The Green Belt Review undertaken for Shropshire indicates that this site is located within a Green Belt parcel, the release of which would have a moderate level of harm on the Green Belt. However, a sub-parcel reflecting the extent of site ALV009 was identified which would have a low-moderate level of harm if released. Further details of the Green Belt Assessment and Review and potential mitigation and enhancement of beneficial use are set out in Green Belt Assessment and Review (EV049.01-EV049.05 and EV050.01-EV050.08), with a summary of potential compensatory improvements to the Green Belt in The Green Belt Revised Exceptional Circumstances paper EV051.
  - d. Site guidelines include requirements for high-quality layout and design, to reinforce Green Belt boundaries and that opportunities should be taken to link green infrastructure from the site to the wider Green Belt and scope for other improvements to the biodiversity and accessibility be taken, including provision of additional planting to improve biodiversity, and minimise and mitigate visual encroachment into Green Belt.

- e. A public right of way which crosses the site needs to be retained and opportunities for linkages to the existing rights of way network in Green Belt beyond the site taken.
- f. Noise associated with the A442. Site guidelines require additional planting and draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
- g. The site ALV009 is within an area of medium-low landscape sensitivity and medium-low visual sensitivity for housing. This has been appropriately considered within the site assessment. Furthermore, site guidelines include a range of expectations on site design and layout to ensure they positively respond to and mitigate this matter.
- h. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Alveley.

**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 ALV009.
- 7.4. With specific regard to flood risk at ALV009, in summary:
  - a. With regard to fluvial flood risk, proposed allocation ALV009 is located entirely within Flood Zone 1, the area with the lowest risk of flooding and around 1% of site is within 20m of a river network.
  - b. With regard to other sources of flood risk, ALV009 is not within any identified surface flood risk zones.

- 7.5. The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094), which gave consideration to all proposed allocations including ALV009. It concluded that the site ALV009 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 ALV009 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 ALV009.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that ALV009 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 ALV009 within Schedule S3.2(i) of draft Policy S3.2 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) Green Belt Assessment EV049.01 & EV049.02; Green Belt Review EV050.01 - EV050.08.
- 8.5. The site guidelines include:
  - a. Provision of a footway to provide pedestrian access.
  - b. Extension of the 30mph zone on A442.

- c. Providing green infrastructure and enhancing links between the site and the wider area.
  - d. Safeguarding ecological interest.
  - e. Protection of right of way on the site and linkage to wider rights of way network.
  - f. Reinforcing Green Belt boundaries with additional planting
  - g. Retention and enhancement of trees and hedgerows on the site.
- 8.6. Shropshire Council expects all these infrastructure requirements and identified constraints to be addressed through the design and construction of the development and developer contributions associated with the development.
- 8.7. The draft policies in the draft Shropshire Local Plan provide the framework to ensure the achievement of the sustainable development of ALV009. 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 ALV009 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have

recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).

- 9.3. Shropshire Council would note that within their Regulation 19 consultation response (reference A0350), a developer response has indicated their intention to deliver the site with indicative site layout plan provided.

**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 ALV009 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 residential development of the site will commence in 2028/29 and continue until 2029/30. The Council also anticipates that residential element of development will progress at a rate of around 15- 20 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 ALV009 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 ALV009.
- 11.3. ALV009 is well contained with a main road boundary to eastern side, the adjoining edge of the village to the north and existing tree and hedgerows to other boundaries which can be reinforced. The site adjoins existing residential development and would form an appropriate extension to the existing built up area of the village.

11.4. The Green Belt Review EV050.01 - EV050.08 undertaken for Shropshire indicates that this site is located within a Green Belt parcel(P70), the release of which would have a low-moderate level of harm on the Green Belt. The site equates to an assessed sub-parcel forming the northern part of the larger assessed parcel P72. This sub parcel adjoining the existing settlement edge was identified to have a low-moderate level of harm if released. The sub parcel is described as strongly contained by mature trees, a residential garden, tree planting and the settlement edge of Alveley. It is not considered to form part of the wider countryside and to be heavily influenced by the adjoining settlement edge.

**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 ALV009 within Schedule S3.2(i) of draft Policy S3.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of ALV009; 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 ALV009.
- 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). Green Belt Assessment EV049. 01 & EV049. 02; Green Belt Review EV050.01 & EV050.08.
- 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 ALV009 – 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 ALV009.

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 ALV009, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:

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

12.8. Shropshire Council is aware that representations made during the Regulation 19 Pre-Submission Consultation (summarised in SD014.01 GC4o) and Post Stage 1 Interim Findings Consultation (summarised in GC53) included objections relevant to specific site guidelines proposed for site ALV009. Dealing with the main objections in turn:

- a. Groundwater issues need to be considered and addressed. This is not specifically addressed in guidelines but Draft Policy DP19 addresses water resources and water quality and establishes specific expectations for development in this circumstance.
- b. Ecological issues have not been adequately considered: Shropshire Council would indicate these matters are addressed by proposed site guidelines. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
- c. Site guideline for footway requirement along the A442 should be amended to provide for it to be provided specifically on adopted highway land given limited space between third party land and



highway. Shropshire Council however considers that the site guideline provides sufficient flexibility and that this is a matter more appropriately addressed in connection with any future planning application should the site be allocated.

- d. Site guidelines should recognise the need for access through the roadside tree belt. Shropshire Council however considers that the site guideline provides sufficient flexibility and that this is a matter more appropriately addressed in connection with any future planning application should the site be allocated.

### **Questions: Site Allocation DNP009 – Land off Derrington Road, adjacent to Brown Clee Primary School, Ditton Priors**

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

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

- 1.1 This proposed allocation lies to the north of the village of Ditton Priors. It consists of a part of a large agricultural field which is bounded by existing residential properties and Derrington Road to the west and agricultural land to the North. The site shares a boundary with Brown Clee Primary School to the South and has a field boundary to its northern side.
- 1.2 To inform the identification of proposed site allocations, including DNP009, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3 Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4 Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44).
- 1.5 Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6 Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
  - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters'

applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
  - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7 Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8 Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
  - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
  - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
  - d. Consideration of other strategic matters.
  - e. Application of professional judgement.
- 1.9 A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Bridgnorth 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 11 sites were considered at Ditton Priors. Within Stage 3 of the site assessment process, around 7 sites were considered at Ditton Priors.

- 1.11 DNP009 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 DNP009 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13 Shropshire Council is aware that representations were made during the Regulation 19 Pre-Submission Consultation but did not raise any specific objections to the site assessment process undertaken to identify the proposed allocation of DNP009 but related instead to the principal of development in Ditton Priors and the suitability of Ditton Priors as a Community Hub.
- 1.14 In conclusion, Shropshire Council considers that DNP009 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. DNP009 is proposed to be allocated for residential development. This site is some 2.48 ha in size and the approximate site provision figure is some 40 dwellings.
- 2.2. Detailed development guidelines within Schedule S3.2(i) of draft Policy S3.2 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 S3.12(i) of draft Policy S3.2 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 DNP009.

- 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 DNP009, and an additional area of land to provide for Biodiversity Net Gain (BNG), is currently the subject of a Full Planning Application (24/02828/FUL) which was validated on 29<sup>th</sup> July 2024. The development proposed is for 44 dwellings consisting of a mix of 1, 2, 3 and 4 bed properties, include 11 affordable dwellings, plus associated infrastructure, access, off site footpath, public open space and landscaping.

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

**Shropshire Council Response:**

- 5.1. DNP009 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 DNP009 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 Ditton Priors 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 and its surroundings.

- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
- a. The introduction of an extended 30 mph zone and provision for non-vehicular access to services, facilities and recreational areas by providing a footway along the site's frontage into the village.
  - b. Provision of a new access to and parking for the primary school and pedestrian access to the school.
  - c. Ability to provide green infrastructure in association with exclusion of development from areas subject to flood risk and a sustainable drainage and water management strategy.
  - d. Potential enhancement of the environmental network with additional planting, including to create an eastern boundary to the site, as well as the retention of mature trees and hedgerows.
- 5.5. More generally, it is also considered that development of DNP009 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 DNP009 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 DNP009.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that DNP009 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 DNP009 within Schedule S3.2(i) of draft Policy S3.2 were informed by the site assessment process and positively respond to the potential adverse impacts identified. Furthermore, the requirements of other draft policies within the draft Shropshire Local Plan appropriately respond to these potential adverse effects and provide further assurance that they will be appropriately mitigated.

- 6.4. In summary, potential adverse impacts and relevant site guidelines / draft policies include:
- a. The design and layout of development will be expected to take into account relationship with adjoining residential properties and consider any noise impacts from adjoining road frontage and school. Draft Policy DP18 establishes specific expectations to appropriately manage noise concerns.
  - b. There are significant trees and hedgerows present and potential ecological interest and potentially within the impact risk zone for Sites of Special Scientific Interest (SSSI). As such, site guidelines require relevant supporting studies and that retention of significant trees and hedgerows be prioritised. Furthermore, draft Policy DP12 ensures the conservation, enhancement and restoration of natural environment assets in Shropshire.
  - c. The guidelines additionally seek the creation of a new eastern site hedgerow boundary to define the site which will also provide green infrastructure and network benefits.
  - d. A component of the site is located within the surface water flood risk zone. Site guidelines require safe, dry access and that the design and layout of development take into account surface water flood risk. Furthermore, the guidelines require appropriate sustainable drainage and stipulate any residual surface water flood risk areas will be managed by excluding development from the affected areas of the site and will form part of the Green Infrastructure network.
  - e. The site consists of best and most versatile agricultural land, applying precautionary principle this also applies to the majority of the land around Ditton Priors. This has been appropriately considered within the site assessment.
  - f. The site DNP009 is within an area of medium landscape sensitivity and medium visual sensitivity for housing. This has been appropriately considered within the site assessment and site guidelines recognise the need to take this into account. Development design and layout will be expected to complement the village's rural character and setting, with any scheme for development considering the proximity of the site to the Shropshire Hills National Landscape.
  - g. Heritage assessment required with any planning application to consider archaeological potential. Furthermore, draft Policy DP23 ensures the conservation and sympathetic restoration and enhancement of historic environment assets in Shropshire.

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

**Shropshire Council Response:**

- 7.1 The evidence base prepared to inform the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA). This assessment considers flood risk from all sources.
- 7.2 Shropshire Council considers this SFRA is proportionate and robust. In seeking to positively respond to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32). This note provides further confidence in the robustness of the SFRA.
- 7.3 The SFRA was an important consideration within the site assessment process undertaken by Shropshire Council to inform proposed allocations. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation DNP009.
- 7.4 With specific regard to flood risk at DNP009, in summary:
  - a. With regard to fluvial flood risk, proposed allocation DNP009 is located entirely within Flood Zone 1, the area with the lowest risk of flooding. 9% of the site is within 20m of a detailed river network.
  - b. With regard to other sources of flood risk, around 2% of proposed allocation DNP009 is located within the 100 year surface flood risk zones and around 19% of proposed allocation DNP009 is located within the 1,000 year surface flood risk zone.
- 7.5 The proposed site guidelines for DNP009 within Schedule S3.2.1(i) of draft Policy S3.2 address this issue, stating *"The access, design and layout of development will also need to take into account any mapped surface water flood risk. Residential development will be excluded from the portions of the site located in 1 in 1,000 surface flood risk zone. Evidence is required that any design will deliver safe dry access to all areas of the site where habitable dwellings are located. Any flood mitigation measures must not displace water elsewhere."* Further guidelines state that, *"the site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy"* and that *"any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which should form part of the Green Infrastructure network."*
- 7.6 The evidence base prepared to inform the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test

Assessment (EV094), which gave consideration to all proposed allocations including DNP009. It concluded that the site DNP009 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 DNP009 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 DNP009.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that DNP009 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 DNP009 within Schedule S3.2(i) of draft Policy S3.2 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. Addressing provision of missing lengths of footway through continuous footway provided along the site road frontage and into the village.



- b. Extension of the 30mph zone on Derrington Road.
  - c. Providing new access to and parking for the primary school and provision of pedestrian access to the school.
  - d. Enhancing pedestrian, cycle and vehicular links to services and facilities in the village.
  - e. Retention of trees and hedgerows on the site.
  - f. Creation of new of a new eastern hedgerow boundary to define the site.
  - g. Providing sustainable drainage, excluding development from and incorporating any residual areas of surface water flood risk into the green infrastructure network.
  - h. Requirement for relevant supporting studies to be undertaken including in relation to heritage, ecology, trees and hedgerow heritage assessment and water with recommendations clearly reflected in the proposed development scheme.
- 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 DNP009. 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 DNP009 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. The Council would also reference the current Full Planning Application (24/02828/FUL) for the residential development of DNP009.

**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 DNP009 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 anticipated that development of the site will commence in 2026/27 and continue until 2027/28. The Council also anticipates that development will progress at a rate of 15-25 dwellings per annum, consistent with standard assumptions for this part of Shropshire.
- 10.3. The Council would note that the site DNP009 is currently the subject of a Full Planning Application (24/02828/FUL).
- 10.4. Shropshire Council takes a precautionary approach and considers therefore that 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 DNP009 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 DNP009.
- 11.3. The boundary for DNP009 is defined by Derrington Road and existing properties to the west, the primary school to the south and field boundary to the north. The eastern boundary does not correspond to an existing field boundary as there was no appropriate existing boundary. An eastern boundary can however be created by planting hedgerow to delineate the site which also provides an opportunity to enhance the environmental network.

**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 DNP009 within Schedule S3.2(i) of draft Policy S3.2 are effective, justified and consistent with national policy.
- 12.2. These guidelines address the key requirements and considerations for the development of DNP009; 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 DNP009.
- 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 DNP009– 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 DNP009.
- 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 DNP009, 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 DNP009. Representations received are summarised in SD014.01 and GC4o.