

Shropshire Local Plan Examination

Shropshire Council Response to:

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

Matter 16



**Matter 16 - Ludlow Place Plan Area (policy S10) – see
MMs 087-091**

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 Ludlow Place Plan area is justified, effective, and consistent with national policy.
- 1.2. The proposed strategy for development in the Ludlow Place Plan area is established within draft settlement policies S10.1-S10.4, 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 Ludlow Place Plan area, the draft Shropshire Local Plan identifies the settlements of Burford and Clee Hill as locations to accommodate development. Specifically:
 - a. Ludlow is proposed to be identified as a Principal Centre and the main focus for new development in the south of the County. This development will be in accordance with the requirements of Policy S10.1 and other relevant policies of the Shropshire Local Plan. It will respond to needs in the town and its surrounding hinterland, it will also support the expansion of existing businesses and attract inward investment. Proposed development guidelines for Ludlow anticipate the delivery of around 1,000 dwellings between 2016 and 2038 and around 11ha of employment land will be made available for employment development in order to create choice and competition in the market between 2016 and 2038.

- b. The settlements of Burford and Clee Hill are recognised rural service centres in the Ludlow Place Plan area with Burford acquiring significant status a service centre being situated across the River Teme from the larger settlement of Tenbury Wells in the Malvern Hills district of Worcestershire. As such, it is proposed they will be identified as Community Hubs where new development will respond to local needs consistent with Policy S10.2, Policy SP8, and other relevant policies of the Shropshire Local Plan.
 - i. Proposed development guidelines for Burford anticipate the delivery of around 190 dwellings between 2016 and 2038.
 - ii. Proposed development guidelines for Clee Hill anticipate the delivery of around 75 dwellings between 2016 and 2038.
 - c. It is proposed that no Community Clusters be identified in the Ludlow Place Plan Area.
- 1.5. There are no Neighbourhood Plan areas designated for the Ludlow Place Plan area.
- 1.6. In identifying site allocations to contribute to the achievement of the strategies proposed for Ludlow, Burford and Clee Hill a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options at these settlements.
- 1.7. Through this site assessment process three proposed allocations were identified at Ludlow. The most recent iteration of this assessment work for Ludlow is summarised within Appendix K (SD006.12) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01). The proposed site allocations are:
- a. LUD056 which is a proposed residential allocation for 90 dwellings.
 - b. LUD057 which is a proposed residential allocation for 10 dwellings.
 - c. LUD056 which is a proposed employment land allocation for 5 hectares.
- 1.8. Also through this site assessment process two proposed allocations were identified at Burford (BUR002 for 40 dwellings and BUR004 for 100 dwellings); one proposed allocation was identified at Clee Hill (CHK002 for 20 dwellings). These sites all constitute proposed residential allocations.
- 1.9. The most recent iteration of the assessment work for these settlements is summarised within Appendix K (SD006.12) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).

- 1.10. A significant consideration in the Ludlow Place Plan area is the significance of Ludlow as an historic market town. Settlement Policy S10.1 capture this consideration in the requirement for development in and around Ludlow to respect the significance and setting of this historic market town. This requires the protection, conservation and enhancement of the significance of the Conservation Areas and heritage assets including Ludlow Castle, the Town Walls and other important assets at its historic core, by protecting the setting of the town and its historic assets to ensure the history of Ludlow is recognised and appreciated.
- 1.11. Shropshire Council considers that development proposals in the Place Plan area will contribute to the achievement of the proposed vision, objectives and spatial strategy for Shropshire; contribute to the achievement of sustainable development that meets the needs of all groups within the communities of the Ludlow Place Plan area; and support the long-term sustainability of Shropshire.
- 1.12. The Ludlow Arms Place Plan area does not have any realistic functional relationship to the Black Country, due to its geographic location within Shropshire. As a result, no settlement within the Ludlow Place Plan area was identified as a potential location to accommodate proposed contributions to the Black Country.
- 1.13. The Council considers the proposed approach to development in the Ludlow Place Plan area is justified, as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
- 1.14. In particular, it is responsive to the conclusions of:
 - a. Sustainability Appraisal and Site Assessment processes (SD006.01-SD006.22 and GC44).
 - b. The Hierarchy of Settlements (EV060).
 - c. Assessments of the characteristics of settlements, including the Market Town Profiles (most recent publications EV073.01- EV073.17).
 - d. Conclusions of infrastructure planning processes (most recent publication is GC54).
- 1.15. The Council considers the proposed approach to development in the Ludlow Place Plan area is effective as it includes a clear strategy and detailed criteria to manage development over the entire geography and to conserve the historic significance of Ludlow. This ensures a shared understanding amongst communities, developers and decision makers. As such, it is considered implementable and deliverable over the proposed plan period.

- 1.16. The Council considers the proposed approach to development in the Ludlow 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 LUD056 – Former Coach Depot and land at Fishmore Road, Ludlow

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

Shropshire Council Response:

- 1.1 The proposed allocation LUD056 lies in the north-west of the town on Fishmore Road which forms the western boundary. The site then adjoins residential curtilages to the south abutting properties off New Road. To the north and east, the site abuts properties off Bringewood Rise and Castle View Terrace to the east.
- 1.2 To inform the identification of proposed site allocations, including LUD056, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3 Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4 Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-

SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).

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

- 1.9 A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Ludlow 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 37 sites were considered at Ludlow. Within Stage 3 of the site assessment process, around 17 sites were considered at Ludlow.
- 1.11 LUD056 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 LUD056 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no objections to the site guidelines for LUD056.
- 1.14 Shropshire Council is also aware that representations during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) raised objections to the site assessment process. There were no objections to LUD056 during this further Consultation.
- 1.15 In conclusion, Shropshire Council considers that LUD056 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. LUD056 is proposed to be allocated for residential development. This site comprises 3.32ha of previously developed within the urban area of Ludlow which is designated as a Principal Settlement. The approximate site provision figure is for 90 dwellings.

- 2.2. Detailed development guidelines within Schedule S10.1(i) of draft Policy S10.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site. However, this site progressed quickly through the planning process during the preparation of the Draft Plan and the larger part of the site was granted planning permission under the policies of the adopted Development Plan. A smaller area of the site remains to be allocated and approved for development.
- 2.3. The development guidelines indicate the site is proposed for a broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing. The specific residential development mix on the remainder of 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 housing uses and the associated development guidelines within Schedule S10.1(i) of draft Policy S10.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of LUD056. It has also been informed by Regulation 18 Plan-Making consultation.
- 3.2. 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. This is evidenced by the early release of the site to the market and the successful application for permission and the commencement of development on the site.

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

Shropshire Council Response:

- 4.1. The larger southern portion of the site comprising land at Fishmore Road has delivered 60 dwellings of the total of 71 dwellings permitted under 19/02060/REM and a further 7 dwellings under (19/05374/FUL & 20/01326/FUL. The smaller northern portion comprising the former Coach Depot is currently the subject of an Outline Planning Application (23/03716/OUT) for residential development with an indicative capacity of 9 dwellings. This position

is identified in the Update on Status of Saved and Proposed Allocations (July 2024) (GC51).

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

Shropshire Council Response:

- 5.1 LUD056 is a proposed residential allocation comprising 3.32 hectares which is proposed for 90 dwellings but is expected to deliver 87 dwellings. The allocation is now partially completed with the delivery of 67 dwellings, a further 11 dwellings have consent under Reserved Matters Planning Permission (19/05374/REM) and land remains for a further 9 dwellings. With a resolution to grant Outline Application (23/03716/OUT). This position is identified in the Update on Status of Saved and Proposed Allocations (July 2024) (GC51).
- 5.2 The site is located in the north-west of the town on Fishmore Road which forms the western boundary. The site then adjoins residential curtilages to the south abutting properties off New Road. To the north and east, the site abuts properties off Bringewood Rise and Castle View Terrace to the east.
- 5.3 A key benefit of the proposed development is the provision of a broad range of housing to contribute to meeting the needs of all groups within the town and other communities in the Place Plan area especially through the provision of affordable housing to meet local needs.
- 5.4 Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of LUD056 and the wider draft policies in the draft Shropshire Local Plan), development of the site constitutes sustainable development that contributes to the long-term sustainability of Ludlow and to Shropshire.
- 5.5 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines which include:
 - a. broad range of housing with dwelling types and sizes to help meet local needs including entry level housing to help meet the housing needs of Ludlow.
 - b. Safe highway access to be provided from Fishmore Road.

- c. Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - d. Landscaping and open space to protect trees (west and south-east) with buffering and additional structural planting.
 - e. Open land to protect former quarry restoration and allow foraging / passage of species and use of habitat on site.
 - f. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy.
- 5.6 More generally, it is also considered that development of LUD056 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 LUD056 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 LUD056.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LUD056 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 LUD056 within Schedule S10.2(i) of draft Policy S10.2 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. Potential impact on setting of Ludlow Conservation Area. Site includes the site of a former Fishmore Brick and Pipe Works (HER PRN 07059) and is considered to have industrial archaeological potential. Site guidelines require heritage impact assessment to respect archaeological interest as former site of Fishmore Brick and Pipe Works.

- b. Area of site is located within the surface water flood risk zones and a small part of the site is within detailed river network. Site guidelines require appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk may be managed on part of the remaining land to ensure flood and water management measures do not displace water elsewhere.
- c. There is self-set woodland in the south-east corner and mature / semi-mature trees growing along the west boundary. These serve to screen to the site and contribute to the character of the area. Site guidelines require landscaping and open space to protect trees (west and south-east) with buffering and additional structural planting.
- d. Protection of biodiversity and contaminated land likely from past land use. Site guidelines require contamination to be investigated and remediated, as necessary. Open land to protect former quarry restoration and allow foraging / passage of species and use of habitat on site.
- e. Requires satisfactory access and mitigation of road noise to the west. Site guidelines safe highway access to be provided from Fishmore Road and boundary treatment, separation, layout, orientation, sound attenuation of dwellings should enhance amenity of residents and external lighting to avoid adverse impacts on amenity and biodiversity.
- f. Applying the precautionary principle, the site consists of best and most versatile agricultural land. This has been appropriately considered within the site assessment.
- g. Location within the mineral safeguarding area. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

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

- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation LUD056 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at LUD056 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. The only evidence of any significant surface water flooding is around 4% of LUD056 lies within the 1,000 year surface flood risk zone which would limit development to 96% of the site area. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths during severe conditions.
- 7.5. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation LUD056 passed the sequential test and the exception test was not required.
- 7.6. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for LUD056 within Schedule S10.1(i) of Draft Policy S10.1 address this issue, stating *"The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk may be managed on part of the remaining land to ensure flood and water management measures do not displace water elsewhere."*

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 LUD056 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 LUD056.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LUD056 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 LUD056 within Schedule S10.2(i) of draft Policy S10.2 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. Safe highway access to be provided from Fishmore Road.
 - b. Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - c. Landscaping and open space to protect trees (west and south-east) with buffering and additional structural planting.
 - d. Open land to protect former quarry restoration and allow foraging / passage of species and use of habitat on site.
 - e. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy.
 - f. Biodiversity net gain, protection and protection and buffering of wildlife corridors and habitat along with contaminated land remediation.
- 8.6 Shropshire Council considers all these infrastructure requirements and identified constraints will 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 LUD056. 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. The larger southern portion of the site comprising land at Fishmore Road has delivered 60 dwellings of the total of 71 dwellings permitted under 19/02060/REM and a further 7 dwellings under (19/05374/FUL & 20/01326/FUL. The smaller northern portion comprising the former Coach Depot is currently the subject of a Resolution to Grant Outline Planning Application (23/03716/OUT) for residential development with an indicative capacity of 9 dwellings. The allocation is now partially completed with the delivery of 67 dwellings, a further 11 dwellings have consent under Reserved Matters Planning Permission (19/05374/REM). This position is identified in the Update on Status of Saved and Proposed Allocations (July 2024) (GC51).

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 LUD056 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 be completed before 2024/25. There will be a residual amount of development still to be delivered on the site under the Resolution to Grant Outline Planning Application (23/03716/OUT)

for residential development with an indicative capacity of 9 dwellings. It is expected that this would be completed early in the period 2025/26 to 2029/30.

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 LUD056 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 LUD056.
- 11.3. The site is located in the north-west of the town on Fishmore Road which forms the western boundary. The site then adjoins residential curtilages to the south abutting properties off New Road. To the north and east, the site abuts properties off Bringewood Rise and Castle View Terrace to the east.

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

Shropshire Council Response:

- 12.1 Yes. Shropshire Council considers the proposed site guidelines for LUD056 within Schedule S10.2(i) of draft Policy S10.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of LUD056; 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 LUD056.
- 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 LUD056 – 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 LUD056.
- 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 LUD056, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no objections to the site guidelines for LUD056.

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

Questions: Site Allocation LUD057 – Former Deport Riddings Road, Ludlow

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

Shropshire Council Response:

- 1.1 The proposed allocation LUD057 consists of a redundant commercial site within an existing residential area. The site is located in the centre east of Ludlow on Morgan Close off Riddings Road. The site adjoins residential curtilages around the site off Dahn Drive to the north and east and Riddings Park to the south.
- 1.2 To inform the identification of proposed site allocations, including LUD057, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.3 Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.4 Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.5 Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.6 Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal

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

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.7 Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.8 Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.9 A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Ludlow 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 37 sites were considered at Ludlow. Within Stage 3 of the site assessment process, around 17 sites were considered at Ludlow.
- 1.11 LUD057 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 LUD057 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.13 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no objections to the site guidelines for LUD057.
- 1.14 Shropshire Council is also aware that representations during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) raised objections to the site assessment process. There were no objections to LUD057 during this further Consultation.
- 1.15 In conclusion, Shropshire Council considers that LUD057 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. LUD057 is proposed to be allocated for residential development. This site comprises 0.48ha of previously developed within the urban area of Ludlow which is designated as a Principal Settlement. The approximate site provision figure is for 10 dwellings.
- 2.2. Detailed development guidelines within Schedule S10.1(i) of draft Policy S10.1 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. The development guidelines indicate the site might be proposed for change of use to open market housing or other residential uses or may facilitate a more specialised use for apartments or as a small 'care village' meeting a range of elderly residential / care 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 housing uses and the associated development guidelines within Schedule S10.1(i) of draft Policy S10.1 have been informed by the proportionate and robust site assessment process undertaken by the Council. Further information on this site assessment process is provided within the response to Question 1 regarding proposed allocation of LUD057. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.2. 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. This is evidenced by the early release of the site to the market and the current application for permission to develop the site.

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

Shropshire Council Response:

- 4.1. This previously developed site is currently the subject of a Full Planning Application (24/02501/FUL) for the demolition of the existing buildings and the erection of 21 affordable dwellings on the redeveloped site.

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

Shropshire Council Response:

- 5.1 LUD057 is a proposed residential allocation comprising 0.48 hectares which is proposed for 9 dwellings. The site is located in the centre east of Ludlow on Morgan Close off Riddings Road. The site adjoins residential curtilages around the site off Dahn Drive to the north and east and Riddings Park to the south.
- 5.2 A key benefit of the proposed development is the provision of a small housing redevelopment to meet a number of potential market sectors. This will help to contribute towards the needs of more specialist groups within the town and other communities in the Place Plan area especially through the provision of more affordable housing to meet local needs.

- 5.3 Furthermore, Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of LUD057 and the wider draft policies in the draft Shropshire Local Plan), development of the site constitutes sustainable development that contributes to the long-term sustainability of Ludlow and to Shropshire.
- 5.4 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines which include:
- a. Redevelopment for residential use may deliver around 10 dwellings with layout, orientation and design to avoid adverse impacts on the existing residential amenity in this densely developed neighbourhood.
 - b. Conversion to other residential uses may facilitate a more specialised use for apartments or as a 'care village' meeting a range of elderly residential / care needs.
 - c. Existing junction to provide safe highway access with provision of footway/cycling provision with either removal or retention of existing security infrastructure and with provision of parking within the site.
 - d. Landscaping and open space to complement existing urban trees, allow passage, foraging and habitat for species within the town and improve green infrastructure in locality.
- 5.5 More generally, it is also considered that development of LUD057 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 LUD057 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 LUD057.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LUD057 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 LUD057 within Schedule S10.2(i) of draft Policy S10.2 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. Redevelopment of previously developed site. Site guidelines require relocation of the depot use to enable re-use the site to reduce noise and disturbance and improve residential amenity.
 - b. Potential contaminated land due to site use. Site guidelines require ground conditions from previous use to be investigated and remediated, as necessary.
 - c. Provision of suitable residential access and parking. Site guidelines require the existing junction to provide safe highway access with provision of footway/cycling provision with either removal or retention of existing security infrastructure and with provision of parking within the site.
 - d. Landscaping and open space scheme to soften the commercial character of the existing use of the site and to establish an appropriate level of residential amenity for the residents of the development. Site guidelines require landscaping and open space to complement existing urban trees, allow passage, foraging and habitat for species within the town and improve green infrastructure in locality.

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

Shropshire Council Response:

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

- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation LUD057 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at LUD057 recognises a limited fluvial flood risk to the proposed allocated site, which is located entirely within Flood Zone 1, which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across the site.
- 7.5. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation LUD057 passed the sequential test and the exception test was not required for this previously developed site.
- 7.6. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application.

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

Shropshire Council Response:

- 8.1 Potential constraints and the infrastructure requirements and opportunities associated with any development of LUD057 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 LUD057.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that LUD057 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 LUD057 within Schedule S10.2(i) of draft Policy S10.2 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. Upgrade the existing commercial access from Riddings Road to a suitable standard for a residential area.
 - b. Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - c. Landscaping and open space to protect existing urban trees on south-west boundary with additional landscaping.
 - d. The site will incorporate appropriate drainage.
- 8.6 Shropshire Council considers all these infrastructure requirements and identified constraints will 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 LUD057. 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 LUD057 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of LUD057 stated their intention to comply with policy requirements and deliver the site and further stated *"Obviously if it is allocated by the LPA for future residential use, that may widen the horizons for the future use of the site, (this might involve partial or complete re-development). The site is viable and deliverable having regard to the policy requirements in the 'Draft 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 LUD057 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2030/31 and continue until 2034/35. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of LUD057 stated *" The site is viable and deliverable having regard to the policy requirements in the 'Draft Local Plan.'*"

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation LUD057 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 LUD057.
- 11.3. The proposed allocation LUD057 consists of a redundant commercial site within an existing residential area. The site is located in the centre east of Ludlow on Morgan Close off Riddings Road. The site adjoins residential curtilages around the site off Dahn Drive to the north and east and Riddings Park to the south.

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

Shropshire Council Response:

- 12.1 Yes. Shropshire Council considers the proposed site guidelines for LUD057 within Schedule S10.2(i) of draft Policy S10.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of LUD057; 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 LUD057.
- 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 LUD057 – 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 LUD057.
- 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 LUD057, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no objections to the site guidelines for LUD057.
- 12.9 Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocation will, if they are ultimately allocated, be determined at the Planning Application stage.

Questions: Site Allocation BUR002 – Land adjoining Lineage Farm on A456, Burford

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

Shropshire Council Response:

- 1.1. The proposed allocation BUR002 lies in the west of Burford opposite the Lower Teme Business Park and close to the Teme Bridge crossing into Tenbury Wells in the Malvern Hills District of Worcestershire.
- 1.2. The proposed allocation BUR002 consists of a large open field situated to the south of the A456, bounded to the west by the Teme Valley Park Homes and to the east by the residential curtilages within the Lineage Farm complex. To the south, the boundary of BUR002 is open to the sloping floodplain of the River Teme but marked by a noticeable break in slope that forms a steep 'step' in the slope.
- 1.3. To inform the identification of proposed site allocations, including BUR002, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4. Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5. Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.6. Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7. Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size:* Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or

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

- b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8. Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.
- 1.9. Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.10. A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Ludlow 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 13 sites were considered at Burford. Within Stage 3 of the site assessment process, around 6 sites were considered at Burford.
- 1.12. BUR002 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 BUR002 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 objection (summarised in SD014.01 and GC4o) to the site and the assessment process undertaken to identify proposed allocation BUR002. This included:
 - a. The principal objections were to recognise the presence of a borehole on BUR002 in the site development guidelines and not to proceed with BUR002 as it would reduce the floodplain of the River Teme and because BUR002 had a low sustainability score.
 - b. Shropshire Council investigated the matter of the borehole which relates to an historical borehole and extraction site. The advice received is, the historical borehole has previously been sealed and would not impact on the development of BUR002.
- 1.15. The resolution to grant Full Planning Permission (23/02796/FUL) has addressed the matter of the anticipated climate change effects on the River Teme through a flood attenuation scheme. The site assessment process that determined the proposed allocation of BUR002 has addressed the sustainability, developability and deliverability of BUR002 in the settlement of Burford.
- 1.16. Shropshire Council is also aware that representations during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) raised objections to the site assessment process. There were no objections to CHK002 during the Regulation 19 Pre-Submission Consultation.
- 1.17. In conclusion, Shropshire Council considers that BUR002 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. BUR002 is proposed to be allocated for residential development. This site comprises 2.04ha of greenfield land forming an 'infilling' site within the urban form of Burford which is designated as a

Community Hub. The approximate site provision figure is for 40 dwellings.

- 2.2. Detailed development guidelines within Schedule S10.2(i) of draft Policy S10.2 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site. However, the specific residential development mix on the site has now been determined through the grant of planning permission.
- 2.3. Where the current planning permission is not implemented, any alternative development proposal 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. The development guidelines indicate the site is proposed for a broad range of housing with dwelling types and sizes to help meet local housing 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 housing uses and the associated development guidelines within Schedule S10.2(i) of draft Policy S10.2 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 of BUR002.
- 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. This is evidenced by the early release of the site to the market and the current resolution to grant consent for development.

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

Shropshire Council Response:

- 4.1. This site is currently the subject of a resolution to grant Full Planning Permission (23/02796/FUL) pending a Section 106 agreement for the erection of 40 dwellings. This position is identified in the Update on Status of Saved and Proposed Allocations (July 2024) (GC51).

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

Shropshire Council Response:

- 5.1 BUR002 is a proposed residential allocation comprising 2.04 hectares which is proposed for 40 dwellings. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area including the provision of affordable housing to meet local needs.
- 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 BUR002 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 Burford (and the adjoining Tenbury Wells in Worcestershire through its close proximity) and to Shropshire.
- 5.3 The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4 Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines.
- 5.5 These site guidelines have already been effective when compared against the resolution to grant permission for Full Planning Permission (23/02796/FUL) erection of 40 dwellings subject to a Section 106 agreement. This position is identified in the Update on Status of Saved and Proposed Allocations (July 2024) (GC51). The site guidelines include:
 - a. access from A456 requires new junction but has the benefit of an existing footway with potential for improvement. Resolution to grant Full Planning Permission (23/02796/FUL) will deliver a simple priority junction on the A456 with Transport Assessment evidence showing the A456 can accommodate the development without detriment to its operational capacity or safety combined with an extension of the 40mph zone.
 - b. access junction should seek to conserve the hedgerow boundary and provide compensatory planting. Resolution to grant Full

Planning Permission (23/02796/FUL) will deliver tree protection and landscaping with conditions to secure their provision.

- c. site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs. Resolution to grant Full Planning Permission (23/02796/FUL) requires the phased delivery of 10 affordable housing units equal to a 25% provision (at +5% above the policy requirement) along with the development of an additional 30 open market housing units.
- d. landscaping and open space to protect trees and hedgerows (west and north), allow foraging / passage of species and use of habitat on site margins. Resolution to grant Full Planning Permission (23/02796/FUL) will deliver a phased Landscaping Scheme with completion on each phase prior to the occupation of the first dwelling. A 47% Biodiversity Net Gain within the scheme including provision of 37 wildlife boxes. Open space provision in three large areas equating to provision of +14% above the policy requirement. Provision of an equipped play area within the whole scheme and provision for maintenance of the equipment.
- e. management of surface drainage should achieve a standard that recognises the proximity of the site to the River Teme SSSI. Resolution to grant Full Planning Permission (23/02796/FUL) recognises the site lies within Flood Zone 1, but will deliver an appropriately sized attenuation basin that maintains greenfield run off rates. Severn Trent Water also agree to a foul drainage connection.
- f. development should link into the surrounding footpath network particularly the right of way eastwards from the proposed open space into the centre of Burford and the Teme Bridge link to services in Tenbury Wells. Resolution to grant Full Planning Permission (23/02796/FUL) will maintain these connections within the Landscaping Scheme.
- g. design, layout and landscaping of the development should recognise the significance and setting of the heritage assets situated close to the site. Resolution to grant Full Planning Permission (23/02796/FUL) requires a phased programme of archaeological works prior to the development commencing. A landscaping condition seeks to mitigate for impacts on the setting of heritage assets, where the public benefits of the development weigh against the 'less than substantial' harm of the proposal.

5.6 More generally, it is also considered that development of BUR002 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 BUR002 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 BUR002.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BUR002 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 BUR002 within Schedule S10.2(i) of draft Policy S10.2 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. Proposed development might adversely impact the operational capacity and safety of the A456. Resolution to grant Full Planning Permission (23/02796/FUL) has addressed this potential impact through the provision of an acceptable junction configuration and extension of the speed restriction zone.
 - b. Proposed development might adversely impact the visual character of the village. Resolution to grant Full Planning Permission (23/02796/FUL) has addressed this potential impact through the provision for an approved Landscaping and Open Space Scheme with a significant Biodiversity Net Gain and a significant open space provision with equipped play space and links with the local footpath network.
 - c. Proposed development might adversely impact the local housing needs of the village. Resolution to grant Full Planning Permission (23/02796/FUL) has addressed this potential impact through the provision of a significant affordable housing provision within the proposed housing scheme.
 - d. Proposed development might be adversely impacted by climate change impacts on the adjacent River Teme. Resolution to grant Full Planning Permission (23/02796/FUL) has addressed this potential impact through the provision of a flood attenuation scheme within the development.

- e. Proposed development might adversely impact the historic character of the village. Resolution to grant Full Planning Permission (23/02796/FUL) has addressed this potential impact through the provision of an archaeological investigation scheme and landscaping provision with conditions to protect the settings of local historic assets.
- f. Applying the precautionary principle, the site consists of best and most versatile agricultural land. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation BUR002 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at BUR002 recognises a limited fluvial flood risk to the proposed allocated site which is located entirely within Flood Zone 1 which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across the site.
- 7.5. A further long-term flood risk was considered in the site assessment for proposed allocated site BUR002 because the site adjoins the valley of the River Teme where there is the potential for climate related changes to the extent of the River Teme, Flood Zone 3. BUR002 may have a longer term sensitivity to a fluvial flood risk in the south-east quadrant of the site.
- 7.6. The proposed site guidelines for BUR002 within Schedule S10.2(i) of draft Policy S10.2 address this issue, stating *"Possible long-term risk from River Teme floodplain requires a reduced site capacity of 40 dwellings. Flood storage improvements including open space on south-east quadrant possibly extending beyond the site boundary*

with an infiltration basin or other flood storage measures along the southern boundary will help to manage the drainage of the site. The provision of Green Infrastructure and management of surface drainage should achieve a standard that recognises the proximity of the site to the River Teme SSSI."

- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation BUR002 passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. This was considered in the approval of Full Planning Permission (23/02796/FUL) where it was concluded that: *"Whilst flood zones 2 and 3 from the River Teme do come within close proximity, the entire development site is located within flood zone 1 (i.e. not at risk from flooding). With regards to surface water flooding, the application demonstrates, with the provision of an appropriately sized attenuation basin, that greenfield run off rates can be maintained. Finally, the applicant has provided a consultation response from Seven Trent indicating their agreement, in principle, to connection of the site for foul drainage. With the above in mind, it would be difficult to maintain objections to the scheme on the grounds of flood risk or drainage."*

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 BUR002 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 BUR002.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BUR002 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 BUR002 within Schedule S10.2(i) of draft Policy S10.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4. They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 8.5. The site guidelines and the requirements of the early permission for BUR002 through the resolution to grant Full Planning Permission (23/02796/FUL) include:
- a. Provision of an appropriate access onto the A456 and ensuring the operational capacity and safety of the strategic road network.
 - b. Provision of a green infrastructure scheme with provision of a biodiversity net gain with significant natural site boundaries.
 - c. Provision of landscaping, open space and recreational facilities to protect the amenity of the development and the visual and historic character of Burford.
 - d. Providing sustainable drainage and protecting the site from climate change impacts to the River Teme within the green infrastructure scheme.
 - e. Provision of investment for social and community infrastructure including local health care provision to be considered within the provision of the developer contributions from the development.
- 8.6. Shropshire Council considers all these infrastructure requirements and identified constraints will 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 BUR002. 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 BUR002 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). The Council would note that a resolution to grant Full Planning Permission (23/02796/FUL) has been reached for the entire development of 40 dwellings with significant public benefits through affordable housing provision, open space provision and Biodiversity Net Gain, subject to a Section 106 agreement.

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 BUR002 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2030/31 and continue until 2034/35.
- 10.3. The Council would note that a resolution to grant Full Planning Permission (23/02796/FUL) has been reached for the entire development of 40 dwellings subject to a Section 106 agreement. This would indicate that this development may be delivered in the

period from 2025/26 either on the finalisation of the S106 agreement or on the adoption of the Local Plan.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation BUR002 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 BUR002.
- 11.3. The proposed allocation BUR002 consists of a large open field situated to the south of the A456, bounded to the west by the Teme Valley Park Homes and to the east by the residential curtilages within the Lineage Farm complex. To the south, the boundary of BUR002 is open to the sloping floodplain of the River Teme but marked by a noticeable break in slope that forms a steep 'step' in the slope.

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 BUR002 within Schedule S10.2(i) of draft Policy S10.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of BUR002; 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 BUR002.
- 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 BUR002 – 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 BUR002.
- 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 BUR002, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
- a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.
 - b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines proposed for BUR002. These are summarised in SD014.01 and GC4o.
- 12.9 The principal objections were to recognise the presence of a borehole on BUR002 in the site development guidelines and not to

proceed with BUR002 as it would reduce the floodplain of the River Teme and because BUR002 had a low sustainability score.

- 12.10 Shropshire Council investigated the matter of the borehole which relates to an historical borehole and extraction site. The advice received is, the historical borehole has previously been sealed and would not impact on the development of BUR002.
- 12.11 The resolution to grant Full Planning Permission (23/02796/FUL) has addressed the matter of the anticipated climate change effects on the River Teme through a flood attenuation scheme. The site assessment process that determined the proposed allocation of BUR002 has addressed the sustainability, developability and deliverability of BUR002 in the settlement of Burford.

Questions: Site Allocation BUR004 – Land adjoining Boraston Drive on A456, Burford

Question 2. *What is the background to the site allocation? How was it identified and which options were considered?*

Shropshire Council Response:

- 1.1 The proposed allocation BUR004 lies to the east of Burford. It consists of a large open field situated to the north of the A456, bounded to the west partly by the residential curtilage and the road alignment of Boraston Drive, to the north by the Tenbury - Bewdley former rail line and to the south by the A456.
- 1.2 To the east, the site is open and extends beyond the intended allocation of BUR004. The proposed green infrastructure network in the east of BUR004 would enclose the built development along the eastern boundary and the remaining land to the east would remain part of the countryside.
- 1.3 The intention for the development of BUR004 is for the development to integrate with and complement the existing built form of Burford along Boraston Drive.
- 1.4 To inform the identification of proposed site allocations, including BUR004, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.5 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).
- 1.6 Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-

SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).

- 1.7 Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.8 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.
- 1.9 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.
- 1.10 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.

- 1.11 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 Ludlow 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 13 sites were considered at Burford. Within Stage 3 of the site assessment process, around 6 sites were considered at Burford.
- 1.13 BUR004 was proactively promoted for residential development through 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 two Regulation 18 Plan-Making consultations (EV005.01 and EV007.01). They were also subsequently subject to the Regulation 19 Pre-Submission Consultation and BUR004 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.15 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no objections to the site guidelines for BUR004.
- 1.16 Shropshire Council is also aware that representations during the recent consultation on additional material prepared in response to the Planning Inspectors Interim Findings (summarised in GC52) raised objections to the site assessment process. There were no objections to BUR004 during this further Consultation.
- 1.17 In conclusion, Shropshire Council considers that BUR004 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. BUR004 is proposed to be allocated for residential development. This site comprises 6.69ha of greenfield land adjoining the eastern edge of Burford which is designated as a Community Hub. The approximate site provision figure is for 100 dwellings including an opportunity for self /custom build housing.

- 2.2. Detailed development guidelines within Schedule S10.2(i) of draft Policy S10.2 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP2; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. The development guidelines indicate the site is proposed for a broad range of housing with potential for self-build, family housing, age specific / special needs housing and affordable provision.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S10.2(i) of draft Policy S10.2 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 of BUR004.
- 3.2. It has also been informed by Regulation 18 Plan-Making consultation and proactive engagement with the site promoter.
- 3.3. Shropshire Council considers the proposals for this site constitute an appropriate strategy and are fully justified – in particular through the proportionate and robust site assessment process undertaken by the Council.

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

Shropshire Council Response:

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

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

Shropshire Council Response:

- 5.1 BUR004 is a proposed residential allocation comprising 6.69 hectares which is proposed for 100 dwellings. As such, a key benefit of the proposed development is the provision of a broad range of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area including the provision of affordable housing to meet local needs and the provision of building plots for self-build or custom build homes.
- 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 BUR004 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 Burford (and the adjoining Tenbury Wells in Worcestershire through its close proximity) and to Shropshire.
- 5.3 The site is located on the eastern edge of Burford, it extends along the A456 and the route of the former Tenbury – Bewdley Railway into the countryside. The site guidelines and proposed policy framework will effectively ensure the development integrates into and complements the existing built form of Burford extending from the existing development along Boraston Drive.
- 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. broad range of housing with potential for self-build/custom build, family housing, age specific/special needs housing and affordable provision within the proposed capacity of 100 dwellings.
 - b. lower density, high specification development with a garden village character on a large prominent site in the east of Burford.
 - c. comprehensive masterplanning of the landscape character overlooking the River Teme SSSI, habitat protection, biodiversity net gain, protection/replacement of trees and hedgerows, conservation and recording of heritage and archaeological assets and their setting, surface water drainage network, green infrastructure network, open space provision with equipped play spaces, new highway access and traffic management measures.
 - d. development will locate open space within green infrastructure network to the north-west to create recreational / parkland with structural planting linking to Tenbury - Bewdley rail line and

- e. balance of green infrastructure network to the south-east will improve the character of this large prominent site, reducing visual impact of development on the A456 and surrounding landscape and integrating the development in the valley of the River Teme SSSI.
 - f. development will respect surrounding heritage and archaeological potential particularly the historic route of the Tenbury – Bewdley Railway across the northern boundary.
 - g. A456 will provide direct highway access with appropriate and suitably located junction and with footway and cycleway access to Boraston Drive to facilitate active travel to local services.
- 5.5 More generally, it is also considered that development of BUR002 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 BUR004 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 BUR004.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BUR004 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 BUR004 within Schedule S10.2(i) of draft Policy S10.2 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. Culverted watercourse passes through the site towards the River Teme. Site guidelines require a SuDS system to manage and improve drainage through the site including the de-culverting of the watercourse subject to hydraulic modelling.

- b. Potential contaminated land in the north from historic landfill. Site guidelines requires further investigation of potential ground contamination in proposed open space to the north west.
- c. Area of site is located within the surface water flood risk zones and a small part of the site is within detailed river network. Site guidelines require open space to the south and east to accommodate the SuDS, de-culverted watercourse and land for surface water flood storage capacity, to hold and manage the discharge of surface water and protect the River Teme as an SSSI.
- d. Medium and medium-high visual sensitivity within the iconic landscape of the River Teme. Site guidelines require a high specification development on this prominent site on the eastern edge of town with green infrastructure to improve the character of this large prominent site and reduce impacts on views from A456 and surrounding landscape, by softening the existing urban aspect along the eastern edge of town and to integrate the development into the valley of the River Teme.
- e. Site is crossed by former line of the Tenbury & Bewdley Railway (HER PRN 08455) with potential archaeological interest from scale of site. Site guidelines requires the development to respect surrounding heritage and the archaeological potential of the site particularly the historic route of the Tenbury – Bewdley Railway across the northern boundary of the site.
- f. northern boundary defined by woodland as key landscape feature and habitat corridor and the development should integrate with the landscape using sustainable mature landscape features (trees and hedgerows. Site guidelines require open space within a green infrastructure network to the north-west to create a recreational / parkland with structural planting linking to Tenbury - Bewdley rail line as a green infrastructure corridor, protecting significant habitat and mitigating any biodiversity impacts subject to detailed ecological and arboricultural assessments.
- g. Potential to mitigate noise through separation distances, orientation and room layout as well as glazing and boundary treatment. Site guidelines require this large open site to manage the development capacity to deliver high specification development on this prominent site supported by re-positioning of 30mph speed restriction to the east, with traffic calming measures.
- h. Applying the precautionary principle, the site consists of best and most versatile agricultural land. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation BUR004 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at BUR004 recognises a limited fluvial flood risk to the proposed allocated site which is located entirely within Flood Zone 1 which is the lowest risk of flooding. The flood risk also recognises:
 - a. Around 6% of BUR004 lies within the 30 and around 8% of BUR004 lies within 100 year surface flood risk zones.
 - b. Around 15% of BUR004 lies within the 1,000 year surface flood risk zone which would limit development to 85% of the site area. This requires a site specific investigation of the surface water flood risk which should seek to protect development from surface water flow paths and standing water.
- 7.5. Further considerations for proposed allocated site BUR004 comprise the need to de-culvert a water course through the centre of the site passing north -south and draining into the valley of the River Teme and the seasonal presence of surface water along the site frontage to the A456.
- 7.6. The proposed site guidelines for BUR004 within Schedule S10.2(i) of draft Policy S10.2 address these issues, stating *"Open space to the south and east will accommodate the SuDS, de-culverted watercourse and land for surface Around 100 dwellings Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Page 221 Site Allocation Development Guidelines Provision water flood storage capacity, to hold and manage the discharge of surface water and protect the River Teme as an SSSI. This area will also provide value as amenity land and landscaping to the site frontage on A456."*

- 7.7. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation BUR004 passed the sequential test and the exception test was not required.
- 7.8. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for BUR004 address this issue, stating "*Site specific flood risk assessment to inform green infrastructure to the south and east to de-culvert the existing watercourse and provide SuDS to manage and improve drainage through the site from the Clee Hills (north) to River Teme SSSI (south) subject to further hydraulic assessment.*"

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 BUR004 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 BUR004.
- 8.2 Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that BUR004 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 BUR004 within Schedule S10.2(i) of draft Policy S10.2 were informed by the site assessment process and address key infrastructure requirements and the mechanisms to address identified constraints.
- 8.4 They were also informed by the wider evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Infrastructure and Investment Plan (GC54); Green Infrastructure Strategy (EV052.01-EV052.30); Open Space Needs Assessment (EV088.01-EV088.05); Playing Pitch Strategy (EV089.01-EV089.03); Landscape and Visual Sensitivity Study (EV071); and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).

- 8.5 The site guidelines and the requirements of the early permission for BUR004 through the resolution to grant Full Planning Permission (23/02796/FUL) include:
- a. Masterplan will indicate preferred location for open space within green infrastructure network in order to:
 - i. Create recreational / parkland with structural planting linking to Tenbury - Bewdley former rail line to the north-west.
 - ii. De-culvert the existing watercourse and provide SuDS to manage and improve drainage through the site from the Clee Hills (north) to River Teme SSSI (south) to the south and east, subject to further hydraulic assessment.
 - iii. Open space to the north west contains an area of potential ground contamination requiring further investigation.
 - iv. Protect significant habitat and mitigate biodiversity impacts subject to detailed ecological and arboricultural assessments.
 - b. Open space, SuDS, de-culverted watercourse and land for surface water flood storage capacity to south and east will hold and manage the discharge of surface water and protect the River Teme SSSI and value as amenity land and landscaping to the A456 frontage.
 - c. A456 will provide direct highway access with appropriate and suitably located junction and with footway and cycleway access to Boraston Drive to facilitate active travel to local services.
 - d. Site will also benefit from existing footway along A458 with improvements, highway drainage and re-positioning of 30mph speed restriction to the east, with traffic calming measures.
 - e. Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).
 - f. Capacity of utilities for this larger development should be assessed and any infrastructure constraints to the delivery of the development should be addressed as part of the development including the servicing of the proposed site for self-build plots.
- 8.6 Shropshire Council considers all these infrastructure requirements and identified constraints will 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 BUR004. 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 BUR004 is realistically viable and deliverable.
- 9.2. This position is supported by the conclusions of the Local Plan Development Viability Study (LPDVS) (EV115.01), which have recently been endorsed by a Viability Assessment Briefing Note (GC49). This matter was also given further consideration within the Viability and Deliverability Topic Paper (EV113).
- 9.3. Shropshire Council would note that within correspondence documented in EV113, the promoters of BUR004 stated their intention to comply with policy requirements and deliver the site and further stated *"Having regard to the proposed policy requirements for BUR004, including the mix of dwellings, the requirement to provide affordable housing and self-build homes, and the site specific factors (such as de-culverting the watercourse and addressing potential site contamination), we can confirm that the site is viable and deliverable. There is known market interest in the site due to Burford and Tenbury Wells being attractive and popular locations for home buyers. Finally, we also confirm that there are no known significant abnormal costs associated with developing the site."*

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

Shropshire Council Response:

- 10.1. Expected timescales and rates of development on proposed allocation BUR004 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence in 2025/26 and continue until 2029/30. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable.
- 10.3. Shropshire Council would note that within correspondence documented in the Viability and Deliverability Topic Paper (EV113), the promoters of BUR004 stated " *There is known market interest in the site due to Burford and Tenbury Wells being attractive and popular locations for home buyers.*" This would indicate that this development may be delivered early in the period from 2025/26 on the adoption of the Local Plan.

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

Shropshire Council Response:

- 11.1. Shropshire Council considers the boundary for proposed allocation BUR004 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 BUR004.
- 11.3. The proposed allocation BUR004 consists of a large open field situated to the north of the A456, bounded to the west partly by the residential curtilage and the road alignment of Boraston Drive, to the north by the Tenbury - Bewdley former rail line and to the south by the A456. To the east, the site is open and extends beyond the intended allocation of BUR004. The green infrastructure network to the east will enclose the built development along this boundary and the remaining land will remain part of the countryside.

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 BUR004 within Schedule S10.2(i) of draft Policy S10.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of BUR004; 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 BUR004.
- 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 BUR004 – 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 BUR004.
- 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 BUR004, which is a 'golden thread' through the 2021 National Planning Policy Framework (NPPF) and is a primary objective of the plan-making process. The site guidelines will also:
 - a. Support the delivery of housing; the achievement of local housing need; and achievement of the proposed housing requirement for Shropshire - consistent with the aspirations of paragraphs 60, 61 and 66 of the NPPF.

- b. Contribute to meeting the needs of the different groups within our communities - consistent with the intentions of paragraph 62 of the NPPF.
 - c. Promote access to services, facilities and infrastructure - consistent with paragraphs 95, 98-103, 104-106, 110-113; and 114 of the NPPF.
 - d. Promote healthy and safe communities – consistent with paragraphs 92-93 of the NPPF.
 - e. Achieve the effective use of land - consistent with paragraphs 119-120 and 124 of the NPPF.
 - f. Support the maintenance of housing supply and delivery - consistent with the intentions of paragraphs 74-77 of the NPPF.
- 12.8 Shropshire Council is aware that representations during the Regulation 19 Pre-Submission Consultation included objection to specific site guidelines which are summarised in SD014.01 and GC4o. There were no objections to the site guidelines for BUR004.
- 12.9 Shropshire Council considers the proposed capacity of BUR004 is appropriate and that the proposed lower density of development is appropriate in the iconic landscape of the River Teme SSSI.
- 12.10 Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocation will, if they are ultimately allocated, be determined at the Planning Application stage.

Questions: Site Allocation CHK002 – Land north of The Crescent, Clee Hill

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

Shropshire Council Response:

- 1.1 The proposed allocation CHK002 is situated to the north-east of the village of Clee Hill in the southern reaches of the National Landscape (Shropshire Hills Area of Outstanding Natural Beauty).
- 1.2 CHK002 is formed of a parcel of quite steeply and irregularly sloping land which is associated with former quarrying activity. Situated in an elevated position in the landscape, CHK002 is naturally sparsely covered with vegetation. The site is accessed via a cattle grid and has a track running along its southern boundary leading to the village.

- 1.3 To inform the identification of proposed site allocations, including CHK002, the Council undertook a proportionate and robust three-stage site assessment process.
- 1.4 Stage 1 of the site assessment process consisted of a strategic screen and review of sites through the Strategic Land Availability Assessment (EV106.01-EV106.10) (SLAA).
- 1.5 Stages 2a, 2b and 3 of the site assessment process form part of the Sustainability Appraisal and Site Assessment process. As such, these assessments are summarised within the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01-SD006.022) and the subsequent additional Sustainability Appraisal (GC44). The most recent iteration of Stage 3 of this assessment is summarised within Appendix Q (SD006.18) of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.01).
- 1.6 Stage 2a of the site assessment process consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal.
- 1.7 Stage 2b of the site assessment process consisted of a screening exercise informed by consideration of a sites availability; size and strategic suitability. Dealing with each of the three filters in turn:
 - a. *Size*: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). Size 'filters' applied were 0.2ha in Community Hubs and Strategic, Principal and Key Centres within/partly within the Green Belt or Shropshire Hills AONB; and 0.5ha for other Strategic, Principal and Key Centres.
 - b. *Availability*: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.
 - c. *Strategic Suitability*: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.
- 1.8 Stage 3 of the site assessment process consisted of a detailed assessment of all remaining sites, during which conclusions were reached about their proposed status within the draft Shropshire Local Plan.

- 1.9 Stage 3 of the site assessment process was informed by:
- a. Analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers.
 - b. The data and conclusions from technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
 - c. Consideration of infrastructure requirements and opportunities, including through proactive engagement with infrastructure providers and the Place Plan process (EV067.01-EV067.18).
 - d. Consideration of other strategic matters.
 - e. Application of professional judgement.
- 1.10 A range of mechanisms were utilised to identify sites for consideration within this site assessment process. This ensured that the Council considered all reasonable site options within the Ludlow 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 4 sites were considered at Clee Hill. Within Stage 3 of the site assessment process, only CHK002 was considered at Clee Hill.
- 1.12 CHK002 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 CHK002 was identified as a proposed allocation within the submission version of the draft Shropshire Local Plan (SD002).
- 1.14 There were no objections to CHK002 during the Regulation 19 Pre-Submission Consultation. A single response supported the specific site guidelines proposed for CHK002 to require a heritage impact assessment of the archaeological interest of CHK002, summarised in GC4o.
- 1.15 In conclusion, Shropshire Council considers that CHK002 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. CHK002 is proposed to be allocated for residential development. This site comprises 0.95ha of greenfield land adjoining the north-eastern edge of the village of Clee Hill which is designated as a Community Hub. The approximate site provision figure is for 20 dwellings.
- 2.2. Detailed development guidelines within Schedule S10.2(i) of draft Policy S10.2 and the wider policies in the draft Shropshire Local Plan provide the policy framework for the development of this allocated housing site.
- 2.3. The specific residential development mix on the site would be particularly influenced by draft Policies DP1; DP3 and the new draft policy on meeting the housing needs of older people and those with disabilities and special needs.
- 2.4. The development guidelines indicate the site is proposed for a broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing.

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

Shropshire Council Response:

- 3.1. The proposed scale and type/mix of housing uses and the associated development guidelines within Schedule S10.2(i) of draft Policy S10.2 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 of CHK002. It has also been informed by Regulation 18 Plan-Making consultation.
- 3.2. 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. CHK002 is currently the subject of discussions between the Council and the site promoter about specific details for the development with a view to submitting an application on the adoption of the Local Plan.

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

Shropshire Council Response:

- 5.1. CHK002 is a proposed residential allocation comprising 0.95 hectares which is proposed for 20 dwellings. As such, a key benefit of the proposed development is the provision of housing to contribute to meeting the needs of all groups within the village and other communities in the Place Plan area which includes the southern reaches of the National Landscape (Shropshire Area of Outstanding Natural Beauty).
- 5.2. Shropshire Council considers that through the proposed policy framework (which includes draft site guidelines addressing key requirements and considerations for development of CHK002 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 Clee Hill and Shropshire.
- 5.3. The site location, extent and proposed boundaries, alongside the proposed policy framework, will effectively ensure the development integrates into and complements the existing built form of the village.
- 5.4. Site specific opportunities identified through such mechanisms as the site assessment process; Regulation 18 Plan-Making Consultations; and wider evidence base prepared to inform the draft Shropshire Local Plan have been reflected within the proposed site guidelines. These include:
 - a. Delivering a broad range of housing within a smaller but local significant development with dwelling types and sizes to meet local housing need including entry level housing.
 - b. Delivering any necessary highway improvements to the local road network including an appropriate access from The Crescent and the potential removal of the cattle grid at the site entrance.
 - c. Ability to provide green infrastructure and open space – including a buffer to the priority habitat grassland adjoining the site, retaining trees, and retaining mature hedgerow to screen the high visual sensitivity of the site within the important National Landscape.
- 5.5. More generally, it is also considered that development of CHK002 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 CHK002 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 CHK002.
- 6.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CHK002 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 CHK002 within Schedule S10.2(i) of draft Policy S10.2 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 comprises an early coal and ironstone former working which is recognised in the Historic Environment Record (PRN 07112). The site development guidelines require:
 - i. a Heritage Impact Assessment and investigation of any relevant archaeological interest; and
 - ii. the investigation and remediation of any land contamination as a result of the former working.
 - b. Ecology surveys are required to protect local wildlife habitat. The site guidelines require relevant ecological surveys with the recommendations reflected in the proposed development scheme. Trees and remaining mature hedgerow on site should be protected.
 - c. High landscape and visual sensitivity. Site guidelines require a green infrastructure scheme to restore habitat on the site and provide for the foraging and passage of species and use of habitat. This should include the retention and enhancement of trees and the remaining mature hedgerow on the site. The green infrastructure scheme should also enhance the amenity of the new residents of the development and help to screen the development within the National Landscape (Shropshire Area of Outstanding Natural Beauty).

- d. Location within the Coal Authority reference area and mineral safeguarding area. This has been appropriately considered within the site assessment.

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

Shropshire Council Response:

- 7.1. The evidence base which informs the draft Shropshire Local Plan includes a Level 1 and Level 2 Strategic Flood Risk Assessment (EV095.01-EV095.66 and EV096.01-EV096.39) (SFRA) which considers flood risk from all sources.
- 7.2. Shropshire Council considers this SFRA to be proportionate and robust. In response to the Planning Inspectors Interim Findings (ID28), the consultants that undertook the SFRA prepared a Clarification Note (GC32) which provides further confidence in the robustness of the SFRA.
- 7.3. The SFRA was an important consideration for the site assessment process which informed the proposed allocations. The response to Question 1 on proposed allocation CHK002 provides further information on the site assessment process.
- 7.4. In summary, the flood risk at CHK002 recognises a limited fluvial flood risk to the proposed allocated site which is located entirely within Flood Zone 1 which is the lowest risk of flooding. There is no evidence of any significant surface water flooding across the site.
- 7.5. The evidence base for the draft Shropshire Local Plan includes a Flood Risk Sequential and Exception Test Assessment (EV094) which considered all the proposed allocations. This assessment concluded proposed allocation CHK002 passed the sequential test and the exception test was not required.
- 7.6. Draft Policy DP21 addresses flood risk, to ensure this is considered as part of the planning application process for all development sites. Draft Policy DP21 includes criteria which 'trigger' the need to undertake site specific Sequential and Exception Test Assessments in response to detailed submissions made with a planning application. The proposed site guidelines for CHK002 within Schedule S10.2(i) of draft Policy S10.2 address this issue, stating *"Relevant supporting studies to be undertaken particularly landscape assessment to protect the Area of Outstanding Natural Beauty, transport assessments, ecology to protect local wildlife sites, tree and hedgerow surveys, flood risk and drainage. Recommendations of the studies to be clearly reflected in the development scheme."*

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

Shropshire Council Response:

- 8.1. Potential constraints and the infrastructure requirements and opportunities associated with any development of CHK002 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 CHK002.
- 8.2. Following due consideration of these matters within stage 3 of the site assessment process, the Council concluded that CHK002 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 CHK002 within Schedule S10.2(i) of draft Policy S10.2 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. Highway improvements at The Crescent to create an appropriate site access possibly with the removal of the existing cattle grid at the site entrance.
 - b. Heritage Impact Assessment and investigation of any relevant archaeological interest from the early coal and ironstone former working (PRN 07112) on the site.
 - c. Investigation and remediation of any land contamination as a result of the former coal and ironstone working.
 - d. Ecology surveys to provide a detailed evaluation of the site and to protect local wildlife habitat.
 - e. Green infrastructure scheme to restore habitat on the site and provide for the foraging and passage of species and use of habitat. This should include the retention and enhancement of trees and the remaining mature hedgerow on the site. This should also enhance the amenity of the new residents and help to screen the development within the National Landscape.

- 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 CHK002. 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 CHK002 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).

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 CHK002 are summarised within Appendix 7 of the draft Shropshire Local Plan. Further detail is then provided within the up-to-date assessment of the housing land supply in Shropshire (GC47).
- 10.2. In summary, the Council anticipates that development of the site will commence and be completed between 2030/31 and 2034/35. The Council anticipates that this smaller development for around 20 dwellings will be completed over a relatively short period once development is permitted and commenced.
- 10.3. Shropshire Council considers these expected timescales and rates of delivery are both realistic and deliverable. CHK002 will support housing needs and attract developer interest in the relatively isolated rural area around the Clee Hills in the National Landscape of the Shropshire Hills Area of Outstanding Natural Beauty. A more cautious assessment has been made of the anticipated delivery of the proposed scheme although the housing provision is locally significant.

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 CHK002 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 CHK002.
- 11.3. The boundary for CHK002 consists of a track to the south serving the village and field boundaries around the rest of the site. The site is also located close to The Kremlin public house and isolated dwellings that surround the village of Clee Hill.

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 CHK002 within Schedule S10.2(i) of draft Policy S10.2 are effective, justified and consistent with national policy.
- 12.2 These guidelines address the key requirements and considerations for the development of CHK002; 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 CHK002.
- 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 CHK002 – 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 CHK002.
- 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 CHK002, 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 There were no objections to CHK002 during the Regulation 19 Pre-Submission Consultation. A single response supported the specific site guidelines proposed for CHK002 to require a heritage impact assessment of the archaeological interest of CHK002 and this is summarised in GC4o.

12.9 Shropshire Council considers the proposed capacity of CHK002 is appropriate. Shropshire Council has generally taken a precautionary approach to site capacity to ensure the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocation will, if they are ultimately allocated, be determined at the Planning Application stage.