

Overview of Shrewsbury ‘Strategic’ Employment Development Options Assessment

1. Introduction - Shrewsbury

- 1.1. To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, the ‘Strategic Approach’ proposed within the Local Plan Review includes an ‘Urban Focus’, by which the majority of new development will be focused in urban areas.
- 1.2. Shrewsbury is the largest settlement in Shropshire¹, both in terms of population and households. It is also the settlement with the most extensive range of services and facilities. As such, in accordance with the principle of ‘Urban Focus’, it is proposed that Shrewsbury will be identified as the Strategic Centre of Shropshire and the primary focus for new development in the County within the Local Plan Review. Recognising this role, and building upon the priority established in the Big Town Plan to achieve balanced growth, between 2016 and 2038, it is proposed that around 8,625 dwellings will be delivered and around 100 hectares of employment land will be made available for development.
- 1.3. Due to the role of Shrewsbury as a ‘Strategic Centre’ in the Local Plan Review and its opportunities to facilitate achievement of the economic needs and aspirations for Shropshire identified within the Local Plan Review and Economic Growth Strategy (2017-2021), it is critical that any proposed employment allocation(s) are deliverable and of the right type, scale and in the right location to be attractive to the market and facilitate the delivery of high-quality and well-designed employment development.
- 1.4. It is also considered critically important that proposed allocation(s) identified in Shrewsbury to accommodate employment development include a high-quality ‘strategic’ employment site, to act as a focus for new employment development in the town/county; complement existing employment sites focused in the north of the town and emerging employment site opportunities on the two existing Sustainable Urban Extensions (SUE’s); and contribute to the economic growth aspirations of the wider region.
- 1.5. In this context, it is important to note that within the Local Plan Review, additional allocations specifically incorporating employment land (dedicated employment allocations or mixed use allocations specifically containing employment land), have been proposed in only four existing settlements, as well as two new strategic settlements, these are:
 - Shrewsbury as the Strategic Centre – new employment land is proposed as part of a mixed-use SUE (5ha) and as a new high-quality ‘strategic’ employment site (45ha) (this document provides further details of the process by which this site was identified);
 - Bridgnorth as a Principal Centre – new employment land is proposed as part of a mixed-use SUE (16ha) alongside two extensions to the successful Stanmore Industrial Estate (11.4ha total);
 - Ludlow as a Principal Centre – new employment land (5ha) is proposed specifically as an extension to an existing employment allocation in order to create a critical mass for development in terms of the provision of infrastructure and the suitability of the site for larger building footprints.
 - Shifnal as a Key Centre on the M54/A5 ‘strategic corridor’ – new employment land is proposed to form a new ‘strategic’ employment campus (39ha).
 - Clive Barracks. Tern Hill – new employment provision of around 6 ha is proposed as part of the extensive mixed use redevelopment of the site, expected to happen after 2025;
 - Former Ironbridge Power Station – new employment provision of around 6ha is proposed as part of the extensive mixed use redevelopment of the site.

¹ All references to Shropshire refer to the Shropshire Council Local Authority area.

- 1.6. The other Principal and Key Centres with employment development guidelines will deliver employment development on any existing mixed use or employment allocations and through appropriate windfall opportunities.

2. Introduction - Site Assessment Process

- 2.1. In order to identify appropriate sites to accommodate development in Shrewsbury, including a potential high-quality 'strategic' employment site, a comprehensive site assessment process has been undertaken (as has occurred and consistent with that undertaken in other settlements where site development guidelines have been proposed).
- 2.2. The site assessment process undertaken is transparent and evidence-based and considers all relevant legislation, policy and guidance, and consultation responses where they raised material issues. It also includes consideration of the following factors: Green Belt (where appropriate); Highways; Heritage; Ecology; Landscape and Visual Sensitivity; Agricultural Land Quality; Flood Risk; Water Quality; Public Protection and any other Strategic Considerations.
- 2.3. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.
- 2.4. The site assessment process also considers any relevant supporting information received as part of relevant site promotions.
- 2.5. The key stages of the site assessment are summarised below:
- 2.6. **Stage 1** of the Site Assessment process was undertaken within the Strategic Land Availability Assessment (SLAA). This involved a technical and very strategic assessment of the suitability; availability; and achievability (including viability) of land for housing and employment development.
- 2.7. **Stage 2a** of the Site Assessment process consisted of the analysis of the performance of sites against the Sustainability Objectives identified within the Sustainability Appraisal Scoping Report. The Sustainability Appraisal and Site Assessment Environmental Report illustrates how these Sustainability Objectives relate to the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.8. **Stage 2b** of the Site Assessment process involved screening of identified sites. This screen was informed by consideration of a site's availability, size and whether there were obvious physical, heritage or environmental constraints present, based on the strategic assessment undertaken within the SLAA.
- 2.9. **Stage 3** of the Site Assessment process considered those sites which were not 'screened out' of the assessment at Stage 2b. It involved a detailed review of sites and selection of proposed site allocations. This stage was informed by:
 - The results of Stage 1 of the Site Assessment process (informs the assessment of sites).
 - The results of Stage 2a of the Site Assessment process (informs the assessment of sites).
 - The results of Stage 2b of the Site Assessment process (informs the site assessed).
 - Assessments undertaken by Highways; Heritage; Ecology; Tree; and Public Protection Officers. In undertaking detailed reviews of sites within stage 3 of the Sustainability Appraisal: Site Assessment process, officers considered best available evidence, where necessary undertook site visits and applied professional judgement in order to provide commentary on each site.
 - Commissioned evidence base studies, including a Landscape and Visual Sensitivity Study; Level 1 Strategic Flood Risk Assessment; and Green Belt Review.

- A Habitats Regulations Assessment.
 - Consideration of infrastructure requirements and opportunities.
 - Other strategic considerations and professional judgement.
- 2.10. For further information on these stages, please refer to the Site Assessment Appendices of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. The summary of the site assessment process undertaken for the Shrewsbury Place Plan Area, which includes Shrewsbury town, is Appendix Q of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.

3. Shrewsbury Site Assessment Process – Identification of a Strategic Employment Site

- 3.1. The site assessment process undertaken for Shrewsbury in order to identify a potential high-quality ‘strategic’ employment site formed part of the wider site assessment process undertaken to identify all potential allocations in the town. This section of the document provides a targeted summary of this process.
- 3.2. Reflecting the scale and importance of Shrewsbury, it is perhaps unsurprising that a significant number of potential site allocations were identified for consideration within the site assessment process. Specifically: 192 sites were identified and considered in and around the town².
- 3.3. In Stage 2b of the site assessment process, 105 sites were ‘screened out’ as:
- There was uncertainty about whether the site is available for relevant forms of development (in Shrewsbury, relevant forms of development for the purpose of this site assessment is residential, employment or mixed-used development incorporating residential and/or employment development); or
 - They were of less than 0.5ha (and there was no potential for allocation as part of a wider site); or
 - The strategic assessment of the site has identified a significant physical, heritage and/or environmental constraint identified within the strategic assessment of sites undertaken within the SLAA.
- 3.4. As a result, Stage 3 of the site assessment process involved consideration of 87 sites.
- 3.5. Whilst all of these 87 sites were considered as part of the general site assessment process undertaken for Shrewsbury, not all were of sufficient size to realistically accommodate a high-quality ‘strategic’ employment site. Specifically, individual sites of less than 25ha are unlikely to have sufficient capacity to accommodate a high-quality ‘strategic’ employment site, particularly given the general assumption that only 40% of the site will actually represent employment floorspace.
- 3.6. As such, of these 87 sites, only around 15 were realistically of sufficient scale in and of themselves to accommodate a high-quality ‘strategic’ employment site.
- 3.7. Of these 15 sites, the majority were specifically promoted for residential development or a mixed used development which either did not include employment development or the employment development represented only a small element of the site.
- 3.8. Furthermore, there was also an element of ‘overlapping’ amongst the sites, illustrating the different formats within which they have been promoted and assessed. This is summarised within the following table:

² Please Note: Following the completion of the SLAA, further sites were promoted for consideration through the consultation and engagement process. Where possible these sites have been included within Stages 2a, 2b and 3 of the Sustainability Appraisal: Site Assessment process.

Site	Site Area	Promoted for Significant Employment Development?	Overlapping Sites Considered Potential High-Quality 'Strategic' Employment Sites	Considered Further – Specifically as a Potential High-Quality 'Strategic' Employment Site?
SHR057	51.46ha	Promoted for residential-led mixed use development (including 7ha of employment land)	N/A	No – Scale of employment land promotion is insufficient to accommodate a Potential High-Quality 'Strategic' Employment Site. Part of the site is proposed for allocation for residential development.
SHR109	50.74ha	Yes	N/A	Yes
SHR157	42.74ha	Yes	SHR157VAR and SHR225	Yes – Jointly with SHR157VAR and SHR225
SHR157VAR	63.49ha	Yes	SHR157 and SHR225	Yes – Jointly with SHR157 and SHR225
SHR158	75.47ha	Promoted for residential led mixed use development, with 5ha of employment land included..	N/A	No – Scale of employment land promotion is insufficient to accommodate a Potential High-Quality 'Strategic' Employment Site. Site proposed for allocation as part of a mixed use SUE.
SHR166	43.28ha	Yes	N/A	Yes
SHR174	93.21ha	Promoted for residential/residential-led mixed use development. Propose mix of uses does not specifically include employment development.	SHR181	No
SHR176	29.42ha	No	N/A	No
SHR181	42.45ha	Promoted for residential/residential-led mixed use development. Propose mix of uses does not specifically include employment development.	SHR174	No
SHR190	36.98ha	No	SHR219 and SHR225	No
SHR192	34.76ha	No	SHR219 and SHR225	No
SHR197	32.83ha	Promoted for residential development. A variation SHR197VAR was subsequently promoted which represented a sub-component of the site (9ha), specifically promoted for employment development.	N/A	No – Full site not promoted for employment. Scale of subsequent employment land promotion is insufficient to accommodate a Potential High-Quality 'Strategic' Employment Site. The variation SHR197VAR was identified as a proposed allocation (as a less 'strategic' employment site) as part of the Regulation 18 stage of consultation, however it was ultimately concluded that the site would constitute a major new direction for growth given its location to the east of the A49 and this was not considered necessary at this time.

Site	Site Area	Promoted for Significant Employment Development?	Overlapping Sites Considered Potential High-Quality 'Strategic' Employment Sites	Considered Further – Specifically as a Potential High-Quality 'Strategic' Employment Site?
SHR198	48.89ha	Possible employment location	N/A	Yes
SHR219	82.60ha	No	SHR190, SHR192 and SHR225	No
SHR225	140.74ha	Mixed use development. Employment element aligns with site SHR157.	SHR157, SHR157VAR, SHR190 and SHR219	Yes – Jointly with SHR157 and SHR225

- 3.9. As illustrated in the above table, of the 15 sites that were realistically of sufficient scale in and of themselves to accommodate a high-quality 'strategic' employment site, 9 were promoted for either residential development or a mixed use development which it was considered did not include sufficient employment land to achieve a high-quality 'strategic' employment site (of these 9 sites, all or part of 2 was ultimately identified as a proposed allocation for other purposes – a residential development and a mixed use development respectively).
- 3.10. Further, 3 of the remaining 6 sites were promotions of a similar location in different formats (two different extents of an employment site and one comprehensive employment and residential development incorporating employment land in the same general location as the other two site promotions).
- 3.11. As such, there were 4 general site options (one of which is promoted in three different formats), promoted for sufficient employment land to achieve a high-quality 'strategic' employment site, a general description of these sites is provided below:

Site	Summary
SHR109:	<ul style="list-style-type: none"> • Greenfield site separated from development boundary by other land. • South of Hencott Pool SSSI/Ramsar/LWS. • No obvious access or road frontage. • Boundary defined to west by the railway line; south by the track to Hencote Farm; and east and north by hedgerow and trees field boundaries.
SHR157 / SHR157VAR / SHR225 (employment element):	<ul style="list-style-type: none"> • Large greenfield site beyond Shrewsbury A5 bypass. • Specific extent of site (and number of agricultural fields included) varies between SHR157, SHR157VAR and SHR225, however all three options include the central fields in the area between the A5 to the north; railway line/old railway line to the south and east; and A488 to the west. • Site has road frontage and potential access onto A488. No existing network or footways. • Site isolated from any development by road and rail line.
SHR166:	<ul style="list-style-type: none"> • Large greenfield site outside development boundary east of the River Severn which separates the site from the urban area. • Bounded by the River Severn and associated flood zone to the east and north, A49 bypass to the west; and Shrewsbury-Wolverhampton railway line to the south. • Site has boundary but no current access onto the A49 bypass. • Element of site is within zones 2 and 3.
SHR198:	<ul style="list-style-type: none"> • Greenfield site located to the north-east of the Livestock Market and north of the A53.

- 3.12. Key considerations resulting from the site assessment are set out below. To provide context to these considerations, extracts from the National Planning Policy Framework (The Framework) are provided, however this is not intended to be exhaustive or suggest that other relevant legislation, policy and guidance has not been considered.

Highways

3.13. By way of context, The Framework includes:

“102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

104. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*
- e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and*
- f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.*

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations”.

- 3.14. Both SHR109 and SHR198 are dependent on the delivery of the North West Relief Road (NWRR) to provide sufficient highway capacity to facilitate their development. SHR109 is also dependent on the NWRR to provide an appropriate site access. As such, from a highway perspective, whilst in time these sites may have development potential, subject to delivery of the NWRR, ahead of this it is not considered that they can be supported by the highway network.
- 3.15. SHR157 / SHR157VAR / SHR225 (employment element) has the potential to gain access off the A488, although the A5 bypass is a barrier to pedestrian/cycle links.
- 3.16. SHR166 has the potential to gain access off the A49 bypass, although the River Severn is a barrier to pedestrian/cycle links.

Flood Risk

- 3.17. Paragraph’s 155, 157 and 158 The Framework state:

“155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”

“157. All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change– so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding”.

3.18. The following table summarised river and surface water flood risk identified for each site:

Site	Summary of Issue
SHR109:	Entirety of site in Flood Zone 1 (lowest risk). Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.
SHR157 / SHR157VAR / SHR225 (employment element):	Entirety of site in Flood Zone 1 (lowest risk). Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.
SHR166:	Majority of site in Flood Zone 1 (lowest risk), small part in Flood Zones 2 and 3. Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.
SHR198:	Entirety of site in Flood Zone 1 (lowest risk). Small part of the site in 1 in 30, 1 in 100 and 1 in 1,000 surface flood risk zones.

3.19. It is considered that all of these sites are of a sufficient size that following the use of SUDs and attenuation ponds, development can avoid any areas with residual surface water flood risk. With regard to SHR166, it is considered that the site is of sufficient size that the development can avoid the elements of the site in flood zones 2 and/or 3.

Landscape and Visual Sensitivity

3.20. Paragraph's 127 and 170 of The Framework state:

"127. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;..."

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;..."

3.21. According to Shropshire Council's Landscape and Visual Sensitivity Assessment the potential landscape and visual impact for each site are:

Site	Summary of Issue
SHR109:	Employment Landscape Impact: Medium-High Employment Visual Impact: Medium
SHR157 / SHR157VAR / SHR225 (employment element):	Employment Landscape Impact: Medium-High Employment Visual Impact: Medium-High
SHR166:	Employment Landscape Impact: High Employment Visual Impact: High
SHR198:	Employment Landscape Impact: Medium-Low (Majority) Employment Visual Impact: Medium-Low (Majority)

3.22. Based on available information regarding landscape and visual sensitivity, it is considered that SHR198 is the least sensitive and SHR166 is the most sensitive in relation to landscape and visual impact of

employment development – although it is noted that site SHR166 is much more self-contained than much of the land (which lies to the east of the A49) within the wider landscape parcel assessed.

- 3.23. The sensitivity of SHR109 and SHR157/SHR157VAR/SHR225 (employment element) lies between the other two sites.

Ecology

- 3.24. Paragraphs 170, 171, 174, 175 and 176 of The Framework state:

“170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”

“174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

175. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

176. The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

- 3.25. A Habitats Regulations Assessment (HRA) would be required for site SHR109, particularly due to its adjacency/proximity to Hencott Pool SSSI/Ramsar Site/LWS. It is considered that this may significantly reduce development capacity. There are tree preservation orders (TPO's) on trees within and on the site boundary. The site may also contain priority habitats and protected species. Northern element of the site could create a habitat that complements Hencott Pool.
- 3.26. A HRA would be required for site SHR157 / SHR157VAR / SHR225 (employment element). There are TPO's on trees along site boundaries. The site contains 3 ponds and may also contain priority habitats and protected species.
- 3.27. A HRA would be required for site SHR166. North-west and south-west corners of the site area are within the Environmental Network due to the proximity to the flood plain. The site may also contain priority habitats and protected species. Could create a habitat corridor along the sites western boundary and under power lines.
- 3.28. A HRA would be required for site SHR198. The site contains a number of ponds (at least 9). There are TPO's on trees along site boundaries. May also contain priority habitats and protected species. A site of this scale would have significant opportunities and could make the most of the existing features.
- 3.29. Based on available information it is apparent that proposals to develop any one of these four sites would need to be informed by a HRA assessment. It is considered that this would very likely limit the capacity of site SHR109, particularly the northern element of the site, given its adjacency/proximity to Hencott Pool SSSI/Ramsar Site/LWS.
- 3.30. With regard to the other ecological factors, it is generally considered that each of the sites are of sufficient size that the design and layout of development could reflect them.

Heritage

- 3.31. The Framework includes:

"190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

"192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

"199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably".

- 3.32. SHR109 is detached from built edge of town. It also includes a possible prehistoric cropmark enclosure (HER PRN 04415) and as it is very large, may also have wider archaeological potential. As such a Heritage Assessment would be required with any Planning Application.
- 3.33. SHR157 / SHR157VAR / SHR225 (employment element) is detached from built edge of town. It also includes a possible cropmark enclosure (HER PRN 00005) and dependent on which extent of the site is considered is also crossed by the projected line of a Roman road (HER PRN 00098). As it is very large it may also have wider archaeological potential. As such a Heritage Assessment would be required with any Planning Application.
- 3.34. SHR166 may effect settings of Scheduled Monuments of Haughmond Hill hillfort (NHLE ref. 1021282) and Queen Eleanor's Bower ringwork (NHLE ref. 1021281). The site contains the majority of a large Roman marching camp (HER PRN 00124) (Part of Roman marching camp was excavated in advance of construction of A49 bypass), so has significant archaeological potential. Site detached from existing built edge of Shrewsbury. As such a Heritage Assessment would be required with any Planning Application.
- 3.35. With regard to Scheduled Monuments of Haughmond Hill hillfort (NHLE ref. 1021282) and Queen Eleanor's Bower ringwork (NHLE ref. 1021281), Heritage Assessment undertaken as part of the site assessment process indicates that less than substantial harm would arise to the significance of these

designated heritage assets as a result of the changes that would occur to their settings. This is also the conclusion of a Heritage Impact Assessment undertaken by the site promoters. Because the tests set out in Paragraphs 193, 194 and 196 of The Framework are therefore engaged, the Council is required to place great weight upon to their conservation.

- 3.36. With regard to the large Roman marching camp (HER PRN 00124), whilst it is considered that an employment use on SHR166 would have a direct effect on the non-designated Roman marching camp, resulting in its partial or total loss, mitigation could be provided by excavating the site prior to development.
- 3.37. SHR198 may have a possible effect on the setting of Shrewsbury Registered Battlefield (NHLE ref. 1000033). It may also have archaeological interest relating to the battle and other archaeological potential. As such a Heritage Assessment would be required with any Planning Application.
- 3.38. With regard to the Shrewsbury Registered Battlefield (NHLE ref. 1000033), the Shrewsbury Battlefield Heritage Assessment, which has been undertaken to inform the Local Plan Review considers the sensitivity of the various elements that contribute to the significance of the Registered Battlefield (including aspects of the Site's setting and views), to future, as yet unspecified development³. This assessment concludes that much of site SHR198 is within the low sensitivity area to future development. No Heritage Impact Assessment has been undertaken by the site promoters.

Agricultural Land Quality

- 3.39. The Framework defines the best and most versatile agricultural land as *"Land in grades 1, 2 and 3a of the Agricultural Land Classification"*. Paragraph 170 of The Framework states:
- "170. Planning policies and decisions should contribute to and enhance the natural and local environment by:... b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland..."*
- 3.40. According to the Natural England Agricultural Land Classification Map⁴, the agricultural land quality of all four sites is as follows:
- SHR109: Primarily Grade 2 with Grade 4 along northern element of the site.
 - SHR157 / SHR157VAR / SHR225 (employment element): Grade 3
 - SHR166: Primarily Grade 2 with a small area of Grade 3 in the northern extent of the site.
 - SHR198: Grade 3.
- 3.41. As such, applying a precautionary approach, it is considered that all these sites have the potential to be amongst the best and most versatile agricultural land.

³ Please Note: The Assessment recognises that an 'impact assessment' of future development proposals is not possible at this stage given that the precise nature, form and scale etc. of potential developments are not known at this time. As such, it is not possible to definitively determine whether, or to what extent, any potential development would result in loss of significance.

⁴ Technical Information Note 049 prepared by Natural England explains that: *"These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance. They show only five grades: their preparation preceded the subdivision of Grade 3 and the refinement of criteria, which occurred after 1976... These are more appropriate for the strategic use originally intended"*. This is recognised and these maps are used only as general guidance within the site assessment process. This increases the importance of a precautionary approach.

Water Quality

- 3.42. None of the four sites SHR109; SHR157 / SHR157VAR / SHR225 (employment element); SHR166 or SHR198 are within an identified source protection zone.

Public Protection

- 3.43. Paragraph's 170 and 180 of The Framework state:

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by:... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."

"180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life..."

- 3.44. SHR109 is close to sources of noise (railway line to the west). SHR157 / SHR157VAR / SHR225 is close to sources of noise (A5 to the north). SHR166 is close to sources of noise (A49 to the east and railway line to the south). SHR198 is close to sources of noise (commercial to south-west and east and A53 to the south). However, for all of these sites it is considered that this can be managed through design and layout of the development, appropriate use of materials and use of green infrastructure buffering.

Other Strategic Considerations

- 3.45. SHR109 would represent a significant new direction of development for the town. The Council's site assessment would indicate this is more suited to the development of a sustainable urban extension given its separation from existing services.
- 3.46. SHR157 / SHR157VAR / SHR225 (employment element) would represent a significant new direction of development for the town, south of the A5. It is also poorly related to the built form of the settlement, given that it lies south of the A5 which is itself a significant physical barrier to development and that there are significant areas of agricultural land north of the A5, between the site and the existing built form of the settlement (much of which has been promoted for development, but is not at this stage proposed to be allocated for development).
- 3.47. SHR166 is separated from the built form of the settlement by the River Severn, which is a significant physical barrier. However, its eastern extent is clearly defined by the A49, which alongside the A5, defines the eastern extent of the built form of Shrewsbury. The site is identified within the adopted Local Plan as a possible location for a Parkway Station.
- 3.48. SHR198 would represent a significant new direction of development for the town. In isolation it is poorly related to the built form of the settlement, given that it is separated from this built form by other land (much of which has been promoted for development, but is not at this stage proposed to be allocated for development) and in isolation projects into the countryside. It also lies east of the A49, which alongside the A5, defines the eastern extent of the built form of Shrewsbury and north of the A5124, which defines the north-eastern extent of the built form of Shrewsbury. As such its development in isolation would be incongruous with the built form of the town. It is also noted that the availability of this site was based on officer knowledge at the start of the site assessment process, however it is understood there has been no further proactive promotion of this site since this time.