

Shropshire Council

Response to the Emery Planning Hearing Statement on the Shropshire Council Five Year Housing Land Supply

Residential development of 70 dwellings including access, open space, landscaping and associated works - Land to the east of Tilstock Road, Tilstock, Whitchurch, Shropshire

PINS ref: 3362414, LPA ref: 24/04176/FUL



1. Context

Overview

- 1.1. The National Planning Policy Framework (NPPF) and 'standard methodology' for assessing Local Housing Need were amended on the 12th December 2024.
- 1.2. The amendments to the NPPF and the new 'standard methodology', which results in an increased Local Housing Need for Shropshire of 1,994 dwellings (previously 1,070 dwellings), both had implications for housing land supply in Shropshire.

Shropshire Council Assessment of Housing Land Supply

- 1.3. Paragraph 78 of the NPPF requires Local Authorities to identify and annually review their housing land supply. The purpose of this assessment is to consider whether there are sufficient deliverable sites to allow for the provision of five years' worth of housing (plus an appropriate buffer), based on the identified housing requirement set out in adopted strategic policies, or against local housing need where strategic policies are more than five years old (unless policies have been reviewed and found up-to-date).
- 1.4. The Council published its most recent assessment of the housing land supply in Shropshire, within the **Five Year Housing Land Supply Statement (2024)** on the 13th February 2025.
- 1.5. Whilst the NPPF and accompanying National Planning Practice Guidance (NPPG) provide valuable information on how to approach such an assessment, it is ultimately the responsibility of the Local Authority to establish an appropriate assessment methodology.
- 1.6. Shropshire Council has developed a proportionate and robust methodology for assessing its housing land supply, which is responsive to and consistent with the NPPF and NPPG, and also reflects local circumstances.
- 1.7. For the avoidance of doubt, this methodology applies the definitions of deliverable and developable provided within Annex 2: Glossary of the NPPF. This is comprehensively explained within Chapter 5 – firstly within the overview (paragraphs 5.25-5.28) and subsequently within the explanation of the various components of the housing land supply in Shropshire.

- 1.8. The Council's most assessment utilises a base date of the 31st March 2024 and covers the period from 2024/25 to 2028/29. As the Council's adopted Development Plan is more than five years old, this assessment is undertaken in the context of local housing need (utilising Government's updated standard methodology).
- 1.9. The assessment concludes that whilst a very significant supply of deliverable housing land exists in Shropshire of 9,902 dwellings, this falls around 567 dwellings short of a five year housing land supply, based on the new Local Housing Need, constituting a 4.73 years' supply of deliverable housing land.

Implications of the Housing Land Supply

- 1.10. Footnote 8 and Paragraph 11(d) of the NPPF detail the implications of not having a five year housing land supply for decision making, in the context of the application of the presumption in favour of sustainable development.
- 1.11. Footnote 8 of the NPPF indicates that where a Council cannot demonstrate a five year supply of deliverable housing sites, it means its planning policies most important to the decision will be considered out of date.
- 1.12. Paragraph 11(d) of the NPPF states: *"where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."*
- 1.13. This does not change the legal principle, set out in section 38(6) of the Planning and Compulsory Purchase Act 2004, that decisions on planning applications are governed by the adopted Development Plan read as a whole, unless other material considerations indicate otherwise.

- 1.14. Rather paragraph 11(d) of the NPPF requires the decision maker to apply less weight to policies in the adopted Development Plan, and more weight to the presumption in favour of sustainable development as a significant material consideration, when reaching a decision. It is for this reason that it is commonly referred to as the 'tilted' balance.
- 1.15. Importantly, the 'tilted' balance approach maintains the general principles of good planning, in that development should be genuinely sustainable in order to be approved. Indeed, paragraph 11(d) of the NPPF specifically highlights several important considerations for the Council before concluding whether a proposal is genuinely sustainable.
- 1.16. Notably it directs development to sustainable locations; ensures it makes efficient use of land; secures well designed places; and provides affordable housing. Other policies of the NPPF will also be relevant in determining the sustainability of proposals.

Rebutting the Supply

- 1.17. Whilst it is recognised that other parties may have alternative views on the methodology utilised when assessing Housing Land Supply, such as that provided within the Emery Planning Hearing Statement, it is ultimately the responsibility of the Local Authority to undertake this assessment and therefore to determine the methodology.
- 1.18. The Council's **Five Year Housing Land Supply Statement (2024)** provides a comprehensive explanation of and justification for the methodology utilised, which is based on best available information. Consequently, the Council considers the matters raised within the Emery Planning Hearing Statement have already been addressed.
- 1.19. It is for this reason, that the information within the Emery Planning Hearing Statement and any subsequent information provided by the appellant, must be considered in the context of the Council's **Five Year Housing Land Supply Statement (2024)**.
- 1.20. Shropshire Council does not consider that simply because a rebuttal is published more recently than the Supply Statement, it offers a more accurate position.

2. Scope of the Rebuttal

- 2.1. Shropshire Council understands from the Emery Planning Hearing Statement, the appellant has agreed with its approach to:
 - a. The base date and period of the five year housing land supply assessment.
 - b. The Council's decision to utilise local housing need in the assessment of the five year housing land supply and calculation of this local housing need (1,994 dwellings per annum).
 - c. The Council's approach to the identification of and application of the appropriate buffer to the housing land supply (of 5%).
- 2.2. Shropshire Council also understands from the Emery Planning Hearing Statement that the relate to the identification of components of the deliverable housing land supply. This leads to disagreement about the extent of the shortfall of the housing land supply.
- 2.3. The following chapters deal with the components of the deliverable housing land supply disputed by the appellant within the Emery Planning Hearing Statement.

3. Sites with Planning Permission

- 3.1. Within the table below, the Council addresses those sites with Planning Permission which the appellant challenges within the Emery Planning Hearing Statement.
- 3.2. The appellant states the reason for these challenges is due to concerns about compliance with the definition of 'deliverable'.
- 3.3. However, notably the appellant accepts that a number of the sites challenged are deliverable, and there challenge in actuality relates to the number of dwellings that are deliverable (build rates) within the five year period.
- 3.4. It is noted that within Chapter 3 of the Emery Planning Hearing Statement, the appellant places significant emphasis on the requirement for the Local Authority to provide evidence that sites are deliverable where they fall within **part b** of the definition of deliverable within the NPPF.

- 3.5. Crucially, a number of the sites challenged by the appellant within this component of the Council's housing land supply fall within **part a** of the definition of deliverable within the NPPF. This definition is clear that such sites *"should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years"*.
- 3.6. As such, for sites that fall within part a of the definition of deliverable sites within the NPPF, the expectation is that the site is deliverable **unless the applicant is able to provide clear evidence this is not the case.**

Reference and Address	Dwelling Details	Council Position
22/04360/FUL Land west of Tilstock Road, Whitchurch	Total Dwellings: 561 Dwellings in the 5YHLs: 350 Dwellings Disputed by Appellant: 44	Site falls within part a of the NPPF definition of deliverable. The Council notes the appellant does not dispute the site is deliverable and provides no specific justification for its assumptions regarding delivery rates – other than reference to national average build rates. This site is under construction and the developer is a national housebuilder (Barratt – David Wilson Homes). The delivery rates forecast on this site are informed by engagement with the developer and knowledge of similar schemes in the County. The Council considers its delivery assumptions are entirely appropriate.
21/05743/OUT Land off Ellesmere Road, Hencote	Total Dwellings: 204 Dwellings in the 5YHLs: 204 Dwellings Disputed by Appellant: 204	As anticipated by the Council in its Five Year Housing Land Supply Statement, a Reserved Matters Application (25/01810/REM) is now pending consideration for the entirety of this development. The Application Form for this application confirms pre-application discussions (PREAPM/24/00248) have occurred between the applicant and Council. Simultaneously, a Discharge of Conditions (25/01750/DIS) is pending consideration which addresses the majority of conditions associated with this Outline Planning Permission and related to implementation of development. There are developers associated with this scheme (MACC Group). The nature of this development (extra-care and care home) means delivery will occur in condensed timescales. The Council are confident this scheme will be built-out within the five year period.

Reference and Address	Dwelling Details	Council Position
21/05981/FUL North of London Road, Shrewsbury	Total Dwellings: 134 Dwellings in the 5YHLs: 131 Dwellings Disputed by Appellant: 31	The Council considers there is clear evidence this site is deliverable. Specifically, this site has a developer associated with it (Cornovii Developments) and development is currently ongoing. The purpose of a hybrid permission is to support the phasing of a development. The clear expectation of the Council and developer is that the phase of the site with Outline Planning Permission will 'follow-on' from that with Full Planning Permission. Is the appellant truly suggesting a developer would complete the component of the site with Full Planning Permission (103 dwellings) and then 'demobilise' the site leaving the component with Outline Planning Permission (31 dwellings) unbuilt? It is completely unreasonable to suggest that for a phased and active development of this kind, the only evidence that the component with Outline Planning Permission is deliverable is a Reserved Matters Application. The Council maintains its assumptions are robust and clearly evidenced.
17/05189/FUL Land south of Rocks Green, Ludlow	Total Dwellings: 133 Dwellings in the 5YHLs: 61 Dwellings Disputed by Appellant: 61	The Council considers there is clear evidence this site is deliverable. Specifically, this site has a developer associated with it (Pickstock Homes), development of the first phase has been completed and development of the second phase is currently ongoing. The purpose of a hybrid permission is to support the phasing of a development. The clear expectation of the Council and developer is that the phase of the site will 'follow-on' from each other – as has proven to be the case across phases 1 and 2. Is the appellant truly suggesting a developer would complete two phases of development (68 dwellings which benefited from Full Planning Permission on the Hybrid Planning Permission and 67 dwellings which subsequently benefited from Reserved Matters Permission) and then 'demobilise' the site leaving the third phase of development with Outline Planning Permission (65 dwellings) unbuilt? It is completely unreasonable to suggest that for a phased and active development of this kind, the only evidence that the component with Outline Planning Permission is deliverable is a Reserved Matters Application. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
20/05065/OUT Flax Mill, Spring Gardens	Total Dwellings: 1120 Dwellings in the 5YHLs: 120 Dwellings Disputed by Appellant: 120	As detailed within the Council's Five Year Housing Land Supply Statement: -This Hybrid Planning Permission allows for extensive works on this site. -Much of the approved restoration works phase has now been undertaken. -Preparations, including completion of a Compulsory Purchase Order to assemble the land required to deliver the mixed-use development (including the residential component), has been undertaken. -Consistent with Historic England's stated intention of <i>"marketing of the wider site later in 2024 with a view to appointing an appropriate Development Partner with the necessary experience and track record in the delivery of similar schemes in early 2025"</i>, they have now appointed Peter Barber Architects to design the housing; indicated pre-application discussions will be shortly commence; have sought a development partner and are intending to proceed to <i>"the detailed planning stage with the aim of appointing an appropriate development partner to deliver the scheme this year [2025]."</i> https://architectsjournal.co.uk/news/peter-barber-wins-contest-to-convert-listed-shrewsbury-mill-into-homes https://publicpractice.org.uk/magazine-article/history-in-the-present Lambert Smith Hampton Shropshire Council considers there is clear evidence the site is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered within five years.
21/03378/REM Proposed Care Home, Shillingston Drive, Berwick Grange	Total Dwellings: 70 Dwellings in the 5YHLs: 70 Dwellings Disputed by Appellant: 33	The Council accepts the units approved on this consent constitute communal accommodation (not-self-contained dwellings). On this basis the ratio applied to communal accommodation, based on the national average number of adults in all households should be applied to determine the equivalent number of dwellings. The Council therefore accepts a 33 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 30 dwellings.

Reference and Address	Dwelling Details	Council Position
14/03184/FUL Brogyntyn Hall	Total Dwellings: 69 Dwellings in the 5YHLs: 69 Dwellings Disputed by Appellant: 8	This development evolved through the planning application process. The approved scheme consists of: Construction of new build dwellings (50 dwellings). Conversion of Home Farm complex to dwellings (11 dwellings). Conversion of Brogyntyn Hall from offices to a dwelling (1 dwelling). Conversion of Former Saw Mill (1 dwelling). Reinstatement of Dairy cottage (1 dwellings). The Council therefore accepts a 5 dwelling deduction should be applied to the housing land supply (before application of the 10% non-delivery rate). The Council therefore accepts a 5 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 4 dwellings.
16/02491/REM The Leasowes, Sandford Avenue, Church Stretton	Total Dwellings: 43 Dwellings in the 5YHLs: 43 Dwellings Disputed by Appellant: 43	Site falls within part a of the NPPF definition of deliverable. All relevant conditions have been discharged and a material operation undertaken such that this planning permission constitutes an extant consent. The appellant has provided no clear evidence that homes will not be delivered within five years.
21/01136/FUL Land to the south of Chirbury	Total Dwellings: 40 Dwellings in the 5YHLs: 40 Dwellings Disputed by Appellant: 40	The Council considers there is clear evidence this site is deliverable. The Council worked closely and extensively with the site promoter through the pre-application process to ensure a viable development, which culminated in this Hybrid Planning Permission. Construction of the first phase of development is currently ongoing and the Council is confident that the second phase will follow-on as anticipated by the promoter. Is the appellant truly suggesting a developer would complete the first phase of development (13 dwellings), which includes infrastructure to serve the second phase of development, and then 'demobilise' the site leaving the second phase of development with Outline Planning Permission (27 dwellings) unbuilt? It is completely unreasonable to suggest that for a phased and active development of this kind, the only evidence that the component with Outline Planning Permission is deliverable is a Reserved Matters Application. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
19/02385/FUL Stoke Heath Camp, Warrant Road	Total Dwellings: 38 Dwellings in the 5YHLs: 38 Dwellings Disputed by Appellant: 38	Site fell within part a of the NPPF definition of deliverable. At the base date for this assessment and time of publication an extant planning permission existed on the site. The Council acknowledge that this permission has subsequently lapsed, however this is because the site promoter intends to progress an alternative scheme. Specifically, a Resolution to Grant Outline Planning Application (24/00563/OUT) for 65 dwellings has been reached on the site. This site promoter is a developer (H&S Construction (Stoke) Limited) which specify in the Design & Access Statement prepared to support this application that <i>"Upon approval of the application, the applicant would look to obtain approval for reserved matters (landscaping) and the discharge of any pre-commencement conditions, following which the applicant intends to commence development on site as soon as is practical to deliver open market and affordable homes in a timely manner..."</i>. As such, it is apparent that there is a clear intention to deliver housing on this site within the five year period. Indeed, the 38 dwellings allowance in the five year housing land supply constitutes the minimum likely over this period.

- 3.7. Importantly, within the Council's assessment of the housing land supply, a precautionary approach is employed.
- 3.8. One measure employed to add further robustness, is that a very cautious assumption that 10% of deliverable dwellings on sites with Planning Permission will not be delivered in the five year period.
- 3.9. Within the Council's Five Year Housing Land Supply Assessment (2024), this allowance equated to 677 dwellings, which exceeds the total deductions accepted by the Council and proposed by the appellant.
- 3.10. If site specific deductions were considered necessary, such reductions would need to account for the fact that the 10% allowance would need to be commensurately reduced (as this allowance is calculated based on all sites within this component of the housing land supply).

4. Site Allocations

- 4.1. Within the table below, the Council addresses those site allocations within the adopted Development Plan which the appellant challenges within the Emery Planning Hearing Statement.

Reference and Address	Dwelling Details	Council Position
ELL003a & ELL003b Land south of Ellesmere	Total Dwellings: 250 Dwellings in the 5YHLs: 168 Dwellings Disputed by Appellant: 168	As detailed within the Council's Five Year Housing Land Supply Statement, a Variation Application (24/03711/VAR) has been received for this site. The application is now pending decision with a resolution to grant and confirms the site benefits from an extant Outline Planning Permission. The material supporting this Planning Application confirms that Reserved Matters Applications will be submitted in 2025 and 2026 and subsequent development will commence in 2025/26. Furthermore, Full Planning Permission (23/02170/FUL) has now been granted for enabling works including formation of the link road, footway and cycleway through the site and groundworks/flood alleviation works. These works are specifically to facilitate development of this site and address the concerns associated with previous Reserved Matters Application. The Council maintains its assumptions are robust and clearly evidenced.
CMI Land at Ludlow Road, Cleobury Mortimer	Total Dwellings: 120 Dwellings in the 5YHLs: 108 Dwellings Disputed by Appellant: 108	As recognised by the appellant, this is a site allocation from the recently 'made' Cleobury Mortimer Neighbourhood Plan (21st March 2024). This site was proactively promoted during the Neighbourhood Plan making process. Furthermore, within paragraph 68 of the Examiners Report on this Neighbourhood Plan he explained that "<i>I sought clarification on this matter to be confident in the deliverability of the site and was informed that the site included in the Plan had been resubmitted by the landowner.</i>" The position is consistent with that of the Council's, that this site is deliverable. The Council therefore maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
ALB002 Land at White Acres, Albrighton	Total Dwellings: 90 Dwellings in the 5YHLs: 90 Dwellings Disputed by Appellant: 90	The Council note with some irony that the developer associated with this scheme in Boningale Homes. This constitutes the fourth phase of a development. Phases 1 and 2 have been completed and phase 3 is currently under construction. The Council fully expect phase 4 to 'follow-on' and be built out within the five year period and is aware that this is the developer (this appellants) intention. Is the appellant truly suggesting that they would complete phases 1-3 of this development (60 dwellings, 65 dwellings and 43 dwellings respectively) and then 'demobilise' the site leaving the fourth phase of development with Outline Planning Permission (90 dwellings) unbuilt? It is completely unreasonable to suggest that for a phased and active development of this kind, the only evidence that the component with Outline Planning Permission is deliverable is a Reserved Matters Application. The Council notes these circumstances are not dissimilar to other sites that the appellant disputes in other components of the Council's identified five year housing land supply. The Council maintains its assumptions are robust and clearly evidenced.
OSW024 Eastern Gateway Sustainable Urban Extension, Oswestry	Total Dwellings: 50 Dwellings in the 5YHLs: 50 Dwellings Disputed by Appellant: 50	The majority of this Sustainable Urban Extension benefits from Planning Permission and is currently under construction. As detailed within the Council's Five Year Housing Land Supply Statement, the remaining component is currently subject to a well advanced Outline Planning Application (24/00719/OUT) for 85 dwellings, and the applicant is a developer (Cornovii Developments). The site benefits from and is facilitated by approved HIF funding of £9.3m granted to Shropshire Council (site promoters supported this application process) by Homes England and utilised to deliver improvement works to adjacent Mile End Roundabout, Oswestry. Indeed, the new pedestrian footbridge over the A5 adjoins this site. The Council understands the developer intends to 'build-out' the site in the next five years – indeed this is the purpose of progressing the scheme in the format detailed within the Outline Planning Application. The presence of this Outline Planning Application (24/00719/OUT) by a developer and use of HIF funding to deliver supporting infrastructure constitute clear evidence of firm progress towards the development of this site. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
HO2 Land off Avenue Road, Broseley	Total Dwellings: 20 Dwellings in the 5YHLs: 20 Dwellings Disputed by Appellant: 20	The appellant provides no details regarding why they are disputing the deliverability of this allocation. This is a site allocation from the 'made' Broseley Neighbourhood Plan (15 th December 2022). This site was proactively promoted during the Neighbourhood Plan making process. It is considered that this site is available for development, represents a suitable location for development now, that a suitable development can be achieved on the site and there is a realistic prospect that housing will be delivered within five years. As such the site is considered deliverable within the five year period. The Council therefore maintains its assumptions are robust and clearly evidenced.
SHREW002, SHREW035, SHREW083, SHREW128, ELR64, ELR67 & ELR68 Shrewsbury West Sustainable Urban Extension	Total Dwellings: 304 Dwellings in the 5YHLs: 91 Dwellings Disputed by Appellant: 59	As detailed within the Council's Five Year Housing Land Supply Statement, this is a Sustainable Urban Extension. The dwellings associated with this allocation are those that did not have planning permission at the base date for the assessment (31 st March 2024). As recognised by the appellant, a Full Planning Application (24/02222/FUL) is pending consideration for 32 affordable dwellings on part of the site. Furthermore, a Full Planning Application (24/04563/FUL) is also pending consideration on another part of the site. This follows on from the screening opinion (24/04764/SCR) which had been sought and was reference within the Council's Five Year Housing Land Supply Statement. The applicant is Cornovii Developments. The Council maintains its assumptions are robust and clearly evidenced.
PRE002-011-012 Land west of Shrewsbury Street, Prees	Total Dwellings: 22 Dwellings in the 5YHLs: 22 Dwellings Disputed by Appellant: 22	Site being developer in phases. Phases 1 and 2 (1 and 2 dwellings respectively) have been completed. Phase 3 (5 dwellings) is currently ongoing. The Council fully expects subsequent phases to follow-on and as such maintains its assumptions are robust and clearly evidenced.

- 4.2. Importantly, within the Council's assessment of the housing land supply, a precautionary approach is employed.
- 4.3. One measure employed to add further robustness, is that a very cautious assumption that 10% of deliverable dwellings on site allocation will not be delivered in the five year period.
- 4.4. Within the Council's Five Year Housing Land Supply Assessment (2024), this allowance equated to 76 dwellings. This is considered

an appropriate 'allowance' for any potential slippage to delivery timescales for site allocations.

- 4.5. If site specific deductions were considered necessary, such reductions would need to account for the fact that the 10% allowance would need to be commensurately reduced (as this allowance is calculated based on all sites within this component of the housing land supply).

5. Proposed Site Allocations

- 5.1. Within the table below, the Council addresses those proposed site allocations identified within the draft Shropshire Local Plan (Officers have indicated they are minded to recommend withdrawal of this document from examination, with a decision to be made by Full Council in July 2025) which the appellant challenges within the Emery Planning Hearing Statement.
- 5.2. Crucially, to ensure the consistent consideration of planning applications on these proposed allocations and provide certainty to all relevant parties (including communities, applicants and decision makers), on the 12th February 2025 Shropshire Council's Cabinet approved the adoption of a position statement on this matter.
- 5.3. This position statement enables a **pragmatic approach** to decision making on these proposed allocations, supporting the continued delivery of sustainable development that is plan-led, but recognising and positively responding to the circumstances of the examination of the draft Shropshire Local Plan.
- 5.4. This position statement also **responds to and aligns with** the NPPF in terms of giving weight to emerging Local Plans in appropriate circumstances.
- 5.5. The approach in the position statement recognises that the **evidence base** (including that related to Green Belt) underpinning the draft Shropshire Local Plan is itself **a material consideration** in the planning application decision making process, including in the context of determining what constitutes sustainable development.
- 5.6. As such, the position statement secures a positive framework which provides the necessary certainty required to conclude that selected proposed allocations are deliverable.

- 5.7. It is noted that the appellant references lack of a detailed planning permission as their justification for the exclusion of many of the dwellings on sites within this component of the Council's identified housing land supply.
- 5.8. The Council would note that the NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. Indeed, paragraph 7 of the NPPG on Housing and Economic Land Availability Assessment, in identifying examples of compelling evidence to demonstrate deliverability.
- 5.9. These examples include firm progress towards submission of an application – for example *"a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rate."* Such an agreement may of course include a Statement of Common Ground (SoCG).
- 5.10. They also include *"firm progress with site assessment work"* or *"clear relevant information about site viability"*. Evidence of such information may of course include submissions during the examination of the draft Shropshire Local Plan.

Reference and Address	Dwelling Details	Council Position
SHR060, SHR158 & SHR161 Land between Mytton Oak Road and Hanwood Road, Shrewsbury	Total Dwellings: 1,500 Dwellings in the 5YHLs: 285 Dwellings Disputed by Appellant: 285	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As referenced within the Council's Five Year Housing Land Supply Statement, two Statements of Common Ground (SoCG003 and SoCG018) completed between the Council and the site promoter. Within paragraph 6.6 of the SoCG018 it is specified that <i>"It is anticipated that construction of the first phase of dwellings will begin in 2026/2027, following adoption of the new Shropshire Local Plan and determination of the requisite planning application(s). Buildout rates are expected to peak at a combined rate of 150 dwellings a year throughout the period from 2029 to 2036, with completion of the residential elements by 2038/2039..."</i> An extract of SoCG018 is appended to this document (Appendix 1). The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
BRD030 Tasley Garden Village, Bridgnorth	Total Dwellings: 1,050 Dwellings in the 5YHLs: 225 Dwellings Disputed by Appellant: 225	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As referenced within the Council's Five Year Housing Land Supply Statement with two Statements of Common Ground (SoCG07 and SoCG013) completed between the Council and the site promoter. Within SoCG013 the site promoter indicates that they expect 225 dwellings to be delivered in the first five years and up to 100 dwellings per annum to be achieved on an annual basis. An extract of SoCG013 is appended to this document (Appendix 2). An Outline Planning Application (25/01722/OUT) for up to 1,500 dwellings (including specialist housing) and wider uses. This follows on from the screening opinion (24/02859/SCO) which had been sought and was reference within the Council's Five Year Housing Land Supply Statement. The applicants are developers, Bloor Homes and Taylor Wimpey. The application form for this Outline Planning Application confirms that pre-application discussions (PREAPM/24/00262) were undertaken prior to the submission of this application. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
SHR173 Land west of Ellesmere Road, Shrewsbury	Total Dwellings: 450 Dwellings in the 5YHLs: 250 Dwellings Disputed by Appellant: 250	As detailed within the Council's Five Year Housing Land Supply Statement a Statement, an Outline Planning Application (22/01432/OUT) for up to 450 dwellings is pending consideration, the applicant is a land promoter (Barwood Land). Furthermore a Statement of Common Ground (SoCG012) has been completed between the Council and land promoter. This specifies at paragraph 5.6 that <i>"The Promoter proposes an indicative trajectory for the delivery of the proposed site allocation on the land west of Ellesmere Road as follows:</i> • <i>Outline Planning Permission granted - 2024</i> • <i>Site Sale, Reserved Matters Approvals and Discharge of Conditions - 2025</i> • <i>Lead-in and 50 dwellings completed – 2026</i> • <i>100 dwellings completed – 2027 (target NWRR opening year)</i> • <i>100 dwellings completed – 2028 (plus delivery of Local Centre)</i> • <i>100 dwellings completed – 2029</i> • <i>100 dwellings completed – 2030"</i> Paragraph 5.4 of the SoCG it is specified that <i>"It is agreed in principle between the Parties that 150 dwellings of the 450 dwellings allocated to be delivered on the Site could be delivered prior to the NWRR being</i>

Reference and Address	Dwelling Details	Council Position
		<i>operational without having a severe impact on the highway network...”</i> An extract of SoCG012 is appended to this document (Appendix 3). The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
SHR057 & SHR177 Land north of Mytton Oak Road, Shrewsbury	Total Dwellings: 400 Dwellings in the 5YHLs: 152 Dwellings Disputed by Appellant: 8	As detailed within the Council’s Five Year Housing Land Supply Statement, this site is subject of a Hybrid Planning Application (24/02808/OUT) pending consideration, seeking Full Planning Permission for 102 dwellings and the 80 bedroom Care Home (equivalent to 42 dwellings) and Outline Planning Permission for 298 dwellings. The applicant is a developer (Shropshire Homes) which has confirmed that the Council’s delivery assumptions are correct within Appendix 3 of the Viability and Topic Paper. This forms Appendix 4 of this document. The purpose of a hybrid application is to support the phasing of a development. The clear expectation of the Council and developer is that the phase of the site with Outline Planning Permission will ‘follow-on’ from that with Full Planning Permission. Is the appellant truly suggesting a developer would complete the component of the site with Full Planning Permission (102 dwellings and an 80 bed care home) and then ‘demobilise’ the site leaving the component with Outline Planning Permission (298 dwellings) unbuilt? It is completely unreasonable to suggest that for a phased development of this kind, the only evidence that the component with Outline Planning Permission is deliverable is a Reserved Matters Application. The Council maintains its assumptions are robust and clearly evidenced.
WHT037 & WHT044 Land north of Chester Road, Whitchurch	Total Dwellings: 200 Dwellings in the 5YHLs: 105 Dwellings Disputed by Appellant: 105	As detailed within the Council’s Five Year Housing Land Supply Statement, this site is promoted by a development, Castle Green Homes. Furthermore, within their Matter 24 Statement (M24.04 para 2.24) Castle Green Homes have confirmed that “<i>Castle Green Homes envisage that a start on site with preparatory works would be achievable by June 2025, with the dwellings delivered subsequently at a rate of 40 dwellings per annum from January 2026. This would mean that all homes would be projected to be delivered by January 2031, comfortably within the short and medium term within the plan period. Castle Green Homes have already undertaken preliminary site assessment and scoping works, allowing for a shorter turnaround time to</i>

Reference and Address	Dwelling Details	Council Position
		<i>submit a planning application upon allocation of the sites.</i>" An extract of this statement forms Appendix 5 of this document. An Environmental Screening Opinion (25/01057/SCR) has since been progressed for the site, in advance of a planning application. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
ALB017 & ALB021 Land north of Kingswood Road and Beamish Lane, Albrighton	Total Dwellings: 160 Dwellings in the 5YHLs: 108 Dwellings Disputed by Appellant: 108	A 'resolution to grant' Outline Planning Application (24/02662/OUT) for up to 150 dwellings on the larger component of this site has been reached. The applicant is a site promoter (Wain Estates). Furthermore, as detailed within the Council's Five Year Housing Land Supply Statement, the site promoter has stated within their Matter 7 statement (M7.03 – paragraph 1.16) that "<i>Table A7 of the Pre Submission Version identifies delivery within the Short Term (2020/21-2024/25) and Medium Term (2025/26 – 2029/30). Wain Estates support this assessment.</i>" An extract of this statement is appended to this document (Appendix 6). The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
MDR006 Land adjoining Adderley Road, Market Drayton	Total Dwellings: 125 Dwellings in the 5YHLs: 75 Dwellings Disputed by Appellant: 75	As detailed within the Council's Five Year Housing Land Supply Statement, this site has previously been subject to a refused Planning Application (22/05309/FUL), the applicants included a developer (Bellway Homes). This recent refusal demonstrates developer interest in the site. Indeed, this is confirmed by the site promoter (SLG represented by Emery) which specified within paragraph 2.13 of their Matter 17 Statement (M17.05) that "<i>the site will be the subject of a further full planning application in the short term</i>" and paragraph 2.30 which further specifies that "<i>As the recent full planning application demonstrates, the site is being actively progressed and is deliverable within the next 5 years. We agree with the timescales set out in the Five Year Supply Statement (GC47) which indicates that first completions will take place in 2025/26.</i>" Within M17.05, the site promoter also confirms that necessary technical studies have been undertaken, including noise and flood risk assessments. An extract of this statement forms Appendix 7 of this document.

Reference and Address	Dwelling Details	Council Position
		The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
MDR039 & MDR043 Land at Longford Turning, Market Drayton	Total Dwellings: 120 Dwellings in the 5YHLs: 75 Dwellings Disputed by Appellant: 75	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. An Outline Planning Application (25/01926/OUT) is now pending consideration for up to 100 dwellings on MDR039. The application form for this Outline Planning Application confirms that pre-application discussions (PREAPM/25/00103) were undertaken prior to the submission of this application. Within paragraph 1.1.22 of their Matter 17 statement (M17.02) the promoter, Gladman, states "<i>As a broad matter of principle, Gladman is in a position to prepare and submit a planning application; and secure planning permission quickly. The site is available and deliverable and has the potential to deliver a significant number of dwellings within a 5 year period.</i>" An extract of this statement forms Appendix 8 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
HNN016 Land south of Oak Street, Highley	Total Dwellings: 100 Dwellings in the 5YHLs: 72 Dwellings Disputed by Appellant: 72	The Appellant presents no justification for the exclusion of this site and the associated dwellings from the Five Year Housing Land Supply. As detailed within the Council's Five Year Housing Land Supply Statement, within their Matter 15 statement (M15.02) in response to question 10 the site promoter stated "<i>The site is immediately available. It can be delivered early within the plan period.</i>" An extract of this statement forms Appendix 9 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
SHF022 & SHF023 (part) Land between Windmill View and The Monument on A464, Shifnal	Total Dwellings: 100 Dwellings in the 5YHLs: 72 Dwellings Disputed by Appellant: 72	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. A Full Planning Application (25/01385/FUL) is pending consideration on part of this site for 57 dwellings. The applicant is a developer, Taylor Wimpey. The associated Application Form confirms that this site has been subject to pre-application discussions (PREAPM/25/00026). The remainder of the site is expected to follow-on.

Reference and Address	Dwelling Details	Council Position
		The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
BUR004 Land adjoining Boraston Drive on A456, Burford	Total Dwellings: 100 Dwellings in the 5YHLs: 60 Dwellings Disputed by Appellant: 60	As detailed in the Council's Five Year Housing Land Supply Statement, in paragraph 2.21 of their Matter 16 (M16.02) statement, the site promoter Lone Star Land, state <i>"We can confirm that submission of an outline application is imminent. From the grant of Outline permission, we anticipate 1 year for approval of Reserved Matters and conditions, followed by 9 months for sales. Whilst the first year of delivery may be lower, we anticipate annual delivery of 40-50 dwellings per annum. Assuming timely approval of the applications, we consider the below trajectory is deliverable..."</i> Timescales detailed include completion of 60 dwellings in the five year period. Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site, including through Pre-Application discussions, as detailed within paragraph 2.6 of M16.02. An extract of this statement forms Appendix 10 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
SHA019 Land between the A53 and Poynton Road, Shawbury	Total Dwellings: 60 Dwellings in the 5YHLs: 50 Dwellings Disputed by Appellant: 50	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter has specified that <i>"It is anticipated that the Phase 1 site will come forward in the 'Short Term' (2020 to 2025)..." and "It is anticipated that the Phase 2 site will come forward in the 'Medium Term' (2025 to 2030)". It also states "realistic prospect that housing will be delivered on the site within five years."</i> This correspondence forms an appendix to the Council's Viability & Deliverability Topic Paper. This statement forms Appendix 11 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
FRD011 Land adjoining But Lane on A458, Ford	Total Dwellings: 75 Dwellings in the 5YHLs: 35 Dwellings Disputed by Appellant: 35	As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter has confirmed the site is deliverable early in the proposed plan period. This correspondence forms an appendix to the Council's Viability & Deliverability Topic Paper. This statement forms Appendix 12 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
WHT014 Land at Liverpool Road, Whitchurch	Total Dwellings: 70 Dwellings in the 5YHLs: 70 Dwellings Disputed by Appellant: 70	The site promoter is the developer Persimmon Homes. Within paragraph 10 of their Matter 24 Statement (M24.02) they confirmed " <i>PH would look to bring the site forward within the first 5 years of the plan period. On confirmation of the allocation PH would look to progress a full planning application. Allowing for the subsequent discharge of condition we would anticipate a start on site within 18-24 months of the allocation be confirmed. PH anticipate that the delivery of 70 units thereafter would take between 18-24 months from the start on the site. It is considered that this is a realistic timeframe and that is deliverable.</i> " This generally aligns with the Council's assumptions within the housing land supply. This statement also confirms in paragraph 4 that the " <i>preliminary works</i> " required to inform preparation of a planning application have been undertaken, including as detailed in paragraph 6, consideration of " <i>highway and access issues</i> " and " <i>a range of ecological surveys</i> ". This statement forms Appendix 13 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
SHR054a Land south of Sundorne Road, Shrewsbury	Total Dwellings: 60 Dwellings in the 5YHLs: 60 Dwellings Disputed by Appellant: 60	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter (developer Shropshire Homes) Matter 22 Statement (M22.13) confirmed in response to question 10 that " <i>SHL intend to prepare and submit a planning application for this site as soon as the plan is adopted. They expect completion of the site to take between 2-3 years once construction has begun.</i> " This statement forms Appendix 14 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
WRP001VAR Land west of Trehowell Lane, Weston Rhyn	Total Dwellings: 60 Dwellings in the 5YHLs: 35 Dwellings Disputed by Appellant: 35	As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter (developer Shropshire Homes) confirmed in correspondence with the Council that there is a willing landowner, developer interest and an intention to bring forward the site for development. This statement forms Appendix 15 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
LYH007 Land east of Barley Meadows, Llanymynech	Total Dwellings: 50 Dwellings in the 5YHLs: 50 Dwellings Disputed by Appellant: 50	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. The site is currently the subject of a non-confidential Pre-Application (PREAPM/25/00010) for up to 60 dwellings and a planning application is expected imminently. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
BUR002 Land adjoining Lineage Farm on A456, Burford	Total Dwellings: 40 Dwellings in the 5YHLs: 40 Dwellings Disputed by Appellant: 40	Resolution to Grant Full Planning Application (23/02796/FUL) for 40 dwellings has been reached on the site. This is clear evidence of the progression of this site and the Council maintains its assumptions are robust and clearly evidenced.
WRP017 Land off Station Road, Weston Rhyn	Total Dwellings: 40 Dwellings in the 5YHLs: 15 Dwellings Disputed by Appellant: 15	As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter (Shropshire Council Estates) confirmed in correspondence that the site remains " <i>very much viable and deliverable</i> " and that they will " <i>continue to undertake further diligence work in this respect.</i> " This statement forms Appendix 16 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
BNP024 Land west of Shrewsbury Road, Baschurch	Total Dwellings: 35 Dwellings in the 5YHLs: 35 Dwellings Disputed by Appellant: 35	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter developer (Shropshire Homes) Matter 22 Statement (M22.08) confirmed in response to question 10 that " <i>The site is immediately available and has a developer on board. It can be delivered early within the plan period.</i> " This statement forms Appendix 17 of this document.

Reference and Address	Dwelling Details	Council Position
		The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
WEM025 Land off Trentham Road, Wem	Total Dwellings: 30 Dwellings in the 5YHLs: 30 Dwellings Disputed by Appellant: 30	As detailed within the Council's Five Year Housing Land Supply Statement, the site promoter (Shropshire Council Estates) confirmed in correspondence that the site remains <i>"very much viable and deliverable"</i> and that they will <i>"continue to undertake further diligence work in this respect."</i> This statement forms Appendix 16 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
MIN018 Land west of A488, Minsterley	Total Dwellings: 20 Dwellings in the 5YHLs: 20 Dwellings Disputed by Appellant: 20	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As detailed within the Council's Five Year Housing Land Supply Statement, the site promoters Matter 18 Statement (M18.02) confirmed in response to question 10 that <i>"The site is immediately available and in a sustainable location in a Community Hub settlement. There are a number of developers interested in purchasing the site, but discussions remain confidential until the allocation has been secured. It is anticipated that delivery of the site would be early within the plan period."</i> Considered likely to be delivered within the timescales identified." An extract of this statement forms Appendix 18 of this document. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
BIT022 Land east of Villa Farm, Bicton	Total Dwellings: 15 Dwellings in the 5YHLs: 15 Dwellings Disputed by Appellant: 15	Shropshire Council has engaged in positive dialogue with the site promoter in relation to future development of this site. As detailed within the Council's Five Year Housing Land Supply Statement, the site promoters Matter 22 Statement (M22.06) confirmed in response to question 10 that <i>"The site is immediately available and in a sustainable location located close to the market town of Shrewsbury. There are a number of developers interested in purchasing the site, but discussions remain confidential until the allocation has been secured. It is anticipated that delivery of the site would be early within the plan period."</i> An extract of this statement forms Appendix 19 of this document.

Reference and Address	Dwelling Details	Council Position
		The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.

5.11. Importantly, within the Council's assessment of the housing land supply, a precautionary approach is employed. One measure employed to add further robustness, is that a very cautious assumption that 10% of deliverable dwellings on site allocation will not be delivered in the five year period.

5.12. Within the Council's Five Year Housing Land Supply Assessment (2024), this allowance equated to 230 dwellings. This is considered an appropriate 'allowance' for any potential slippage to delivery timescales for proposed site allocations.

5.13. If site specific deductions were considered necessary, such reductions would need to account for the fact that the 10% allowance would need to be commensurately reduced (as this allowance is calculated based on all sites within this component of the housing land supply).

6. SLAA Sites

6.1. Within the table below, the Council addresses those Strategic Land Availability Assessment (SLAA) sites which the appellant challenges within the Emery Planning Hearing Statement.

Reference and Address	Dwelling Details	Council Position
WEM018 Land behind 18-34 Aston Road, Wem	Total Dwellings: 38 Dwellings in the 5YHLs: 38 Dwellings Disputed by Appellant: 38	This site was initially identified through the Council's Strategic Land Availability Assessment. It has subsequently progressed to the point that an Outline Planning Application (24/03568/OUT) for 38 dwellings pending consideration on the site. This demonstrates the clear progression of the site and constitutes clear evidence supporting deliverability. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council therefore maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
DNP005 Land north-west of South Road, Ditton Priors	Total Dwellings: 20 Dwellings in the 5YHLs: 20 Dwellings Disputed by Appellant: 20	At the base date for this assessment, the Council considered it had sufficient evidence regarding the deliverability of this site to support its position. However, a scheme has not progressed as anticipated and on this basis the Council accepts the site is currently developable rather than deliverable. The Council therefore accepts a 20 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 18 dwellings .
SKH001 Land at Rosehill Road, Stoke Heath	Total Dwellings: 14 Dwellings in the 5YHLs: 14 Dwellings Disputed by Appellant: 14	At the base date for this assessment, the Council considered it had sufficient evidence regarding the deliverability of this site to support its position. However, a scheme has not progressed as anticipated and on this basis the Council accepts the site is currently developable rather than deliverable. The Council therefore accepts a 14 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 13 dwellings .
SHR211 Land at Hollydene, Shrewsbury	Total Dwellings: 14 Dwellings in the 5YHLs: 14 Dwellings Disputed by Appellant: 14	At the base date for this assessment, the Council considered it had sufficient evidence regarding the deliverability of this site to support its position. However, a scheme has not progressed as anticipated and on this basis the Council accepts the site is currently developable rather than deliverable. The Council therefore accepts a 14 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 13 dwellings .

- 6.2. Importantly, within the Council's assessment of the housing land supply, a precautionary approach is employed.
- 6.3. One measure employed to add further robustness, is that a very cautious assumption that 10% of deliverable dwellings on site allocation will not be delivered in the five year period.

- 6.4. Within the Council's Five Year Housing Land Supply Assessment (2024), this allowance equated to 15 dwellings on SLAA sites. Where site specific deductions are considered necessary, such reductions would need to account for the fact that the 10% allowance would need to be commensurately reduced (as this allowance is calculated based on all sites within this component of the housing land supply).

7. Affordable Housing Sites

- 7.1. Within the table below, the Council addresses those emerging Affordable Housing sites which the appellant challenges within the Emery Planning Hearing Statement.

Reference and Address	Dwelling Details	Council Position
HR, Highley North of Hazelwells Road, Highley	Total Dwellings: 24 Dwellings in the 5YHLs: 24 Dwellings Disputed by Appellant: 24	It is important to note that many affordable housing sites have national/local funding which require delivery within specific timescales. As detailed within the Council's Five Year Housing Land Supply Statement, a scheme was being proactively 'worked' up for this site. A Full Planning Application (25/01550/FUL) for 24 dwelling is currently pending consideration on this site. The application form confirms that pre-application discussions occurred between the applicant and Council. The applicant is a developer TC Homes. The Council maintains its assumptions are robust and clearly evidenced.
SC, Wem West of Swain Close, Wem	Total Dwellings: 21 Dwellings in the 5YHLs: 21 Dwellings Disputed by Appellant: 21	It is important to note that many affordable housing sites have national/local funding which require delivery within specific timescales. As detailed within the Council's Five Year Housing Land Supply Statement, this site is subject to an Outline Planning Application (24/02314/OUT) for 21 dwellings. A Resolution to Grant this application has now been reached. The applicant is a developer, Maelor Homes. This shows clear progression of this site to development. The Council's affordable housing enablement service work closely with the promoters of these affordable housing exception sites and inform assumptions on delivery timescales. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.

Reference and Address	Dwelling Details	Council Position
CLT, Sutton Upon Tern Sutton Upon Tern, CLT	Total Dwellings: 14 Dwellings in the 5YHLs: 14 Dwellings Disputed by Appellant: 14	At the base date for this assessment, the Council considered it had sufficient evidence regarding the deliverability of this site to support its position. However, a scheme has not progressed as anticipated and on this basis the Council accepts the site is currently developable rather than deliverable. The Council therefore accepts a 14 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 13 dwellings .
NS, Wem New Street, Wem	Total Dwellings: 14 Dwellings in the 5YHLs: 14 Dwellings Disputed by Appellant: 14	It is important to note that many affordable housing sites have national/local funding which require delivery within specific timescales. The Council has undertaken proactive engagement with the site promoter. In particular, the Council's affordable housing enablement service work closely with the promoters of these affordable housing exception sites and inform assumptions on delivery timescales. The NPPF and NPPG are clear that the presence of planning permission is not the only form of clear evidence of deliverability. The Council maintains its assumptions are robust and clearly evidenced.
FR, Dorrington The Farris, Falklands Road, Dorrington	Total Dwellings: 10 Dwellings in the 5YHLs: 10 Dwellings Disputed by Appellant: 10	At the base date for this assessment, the Council considered it had sufficient evidence regarding the deliverability of this site to support its position. However, a scheme has not progressed as anticipated and on this basis the Council accepts the site is currently developable rather than deliverable. The Council therefore accepts a 10 dwelling deduction is appropriate to the component of this site within the five year housing land supply. However, as a 10% non-delivery allowance is applied to this component of the supply, calculated based on the total deliverable dwellings, the actual reduction to the housing land supply would need to reflect this. As such, the reduction would equate to 9 dwellings .

- 7.2. Importantly, within the Council's assessment of the housing land supply, a precautionary approach is employed.
- 7.3. One measure employed to add further robustness, is that a very cautious assumption that 10% of deliverable dwellings on site allocation will not be delivered in the five year period.

- 7.4. Within the Council's Five Year Housing Land Supply Assessment (2024), this allowance equated to 23 dwellings on SLAA sites. Where site specific deductions are considered necessary, such reductions would need to account for the fact that the 10% allowance would need to be commensurately reduced (as this allowance is calculated based on all sites within this component of the housing land supply).

8. Conclusion

- 8.1. The Council's most recent assessment of the housing land supply in Shropshire, is summarised within the **Five Year Housing Land Supply Statement (2024)**, utilising a base date of the 31st March 2024 and covering the period from 2024/25 to 2028/29.
- 8.2. The assessment concludes that whilst a very significant supply of deliverable housing land exists in Shropshire of 9,902 dwellings, this falls around 567 dwellings short of a five year housing land supply, based on the new Local Housing Need, constituting a 4.73 years' supply of deliverable housing land.
- 8.3. Shropshire Council considers the methodology it has utilised within this assessment is both proportionate and robust. It is responsive to and consistent with the NPPF and NPPG, and also reflects local circumstances.
- 8.4. Crucially, this methodology applies the definitions of deliverable and developable provided within Annex 2: Glossary of the NPPF. This is comprehensively explained within Chapter 5 of the Council's Five Year Housing Land Supply Statement. Firstly within the overview (paragraphs 5.25-5.28) and subsequently within the explanation of the various components of the housing land supply in Shropshire.
- 8.5. Having reviewed the rebuttal provided by the appellant within the Emery Planning Hearing Statement, the Council acknowledge that:
- a. 34 dwellings in the sites with planning permission component of the Council's Five Year Housing Land Supply, were included in error. This consists of 30 dwellings on 21/03378/REM and 5 dwellings on 14/03184/FUL, following appropriate adjustments to reflect the Council's approach to a non-delivery rate.
 - b. 44 dwellings in the SLAA sites component of the Council's Five Year Housing Land Supply may not be delivered within the five year period, as the relevant sites have not progressed as

envisaged when the assessment was being prepared. This consists of 18 dwellings on DNP005, 13 dwellings on SKH001, and 13 dwellings on SHR211, following appropriate adjustments to reflect the Council's approach to a non-delivery rate.

- c. 22 dwellings in the Affordable Housing component of the Council's Five Year Housing Land Supply may not be delivered within the five year period, as the relevant sites (CLT, Sutton Upon Tern and FR, Dorrington) have not progressed as envisaged when the assessment was being prepared.
- 8.6. Reflecting these proposed deductions, Shropshire Council considers that it has a **4.68 years' supply of deliverable housing land**, based on local housing need identified, using Governments updated standard methodology.
- 8.7. The Council however disagrees with the other deductions to the housing land supply proposed by the appellant:
- a. Crucially, a number of the sites challenged by the appellant fall within **part a** of the definition of deliverable within the NPPF. This definition is clear that such sites *"should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years"*. The appellant provides no such evidence to justify proposed deductions for such sites.
 - b. Furthermore, the Council recognises that where the sites challenged by the appellant fall within **part b** of the definition of deliverable within the NPPF *"it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."* The Council strongly considers such evidence is provided for these sites (informed by the examples provided within the NPPF). This evidence is available within the Five Year Housing Land Supply Statement and is supplemented by this document.
- 8.8. Importantly, the Council would note that it applies a very cautious assumption that 10% of deliverable dwellings within most components of the five year housing land supply (including sites with planning permission, SLAA sites and affordable housing sites) will not be delivered within the five year period.
- 8.9. The application of this 10% non-delivery rate acts to offset the limited number of sites that are subject to delays. Therefore, in reality this assumption already offsets the majority of the deductions proposed by the Council and appellant.

Shropshire Council

Response to the Emery Planning Hearing Statement on the Shropshire Council Five Year Housing Land Supply Appendices

Residential development of 70 dwellings including access, open space, landscaping and associated works - Land to the east of Tilstock Road, Tilstock, Whitchurch, Shropshire

PINS ref: 3362414, LPA ref: 24/04176/FUL



Appendix 1

6. Viability and Deliverability

- 6.1 The Parties confirm that the proposed site allocation is both viable and deliverable. The Parties have reviewed the development guidelines set out in Schedule 16.1(i) of the December 2020 Draft Local Plan and do not anticipate any issues in the site's deliverability or viability in this respect.
- 6.2 The site is capable of supporting policy-compliant affordable housing provision (20%), together with the anticipated infrastructure improvements, S106 contributions and CIL payments.
- 6.3 Shropshire Council and the Parties have continued to liaise proactively regarding the viability and deliverability of this site during the Local Plan review process. As a result, it is agreed that, at this stage of the process, this site is viable and deliverable, having given due regard to the proposed site guidelines and policy requirements within the December 2020 Draft Shropshire Local Plan.
- 6.4 It is proposed that delivery of the residential element of the site is likely to be provided by a number of housebuilders, working with specialist providers to deliver the local centre uses and with commercial developers to deliver the commercial elements.
- 6.5 In line with Schedule S16.1(i), if required and evidenced through consultation with the Integrated Care System, up to 0.5ha of land will be provided within the site for the provision of a new medical practice at the appropriate time in the agreed phasing plan and legal agreement.
- 6.6 It is anticipated that construction of the first phase of dwellings will begin in 2026/2027, following adoption of the new Shropshire Local Plan and determination of the requisite planning application(s). Buildout rates are expected to peak at a combined rate of 150 dwellings a year throughout the period from 2029 to 2036, with completion of the residential elements by 2038/2039. At this point in time, this is different to the view expressed by the Council, with the Council being more reserved regarding buildout rates than the Parties.
- 6.7 The local centre will deliver a variety of community facilities and is expected to be delivered as one of the earlier phases of development.

Appendix 2

- 1.32. The site comprises largely greenfield land and is not subject to any known abnormal remediation or preparation costs. The economic viability of the site has been reviewed and it is agreed that the development is economically viable and capable of delivering the required infrastructure having regard to the proposed site guidelines and proposed requirements of the policies of the draft Shropshire Local Plan. Tasley Garden Village (BRDO30) is being promoted by Bloor and Taylor Wimpey, who are experienced developers, with willing landowners. There are no legal covenants that would prevent the land coming forward for development.
- 1.33. The parties agree that this site is deliverable. There is broad agreement between the parties regarding the housing delivery trajectory for the site; although Bloor and Taylor Wimpey consider that development on the site will be delivered quicker than Shropshire Council's assumptions. It is agreed that the site would be capable of starting to deliver dwellings within the first five years of the plan being adopted, with first dwelling completions in 2025/26 and that development would be completed within the plan period. Bloor and Taylor Wimpey expect the final dwellings to be completed in 2035/36, with Shropshire Council assuming the development is completed later in 2037/38.
- 1.34. Shropshire Council's current housing delivery trajectory is set out within the Five Year Housing Land Supply Statement (GC47). Bloor and Taylor Wimpey's housing delivery trajectory is set out in their representations to the additional submission documents (ID A070). The following Table 1 summarises the parties' assumptions on the housing delivery trajectory.

Table 1 – BRDO30 – Expected Housing Delivery Trajectory

Reporting years	Bloor / Taylor Wimpey Assumptions	Shropshire Council Assumptions
Years 1-5 (2023/24 – 2027/28)	225	176
Years 6-10 (2028/29 – 2032/33)	500	410
Years 11-15 (2033/34 – 2037/38) ¹	325	464
Total up to 2037/38	1,050	1,050

Conclusion

- 1.35. This Statement of Common Ground has been prepared by Pegasus Group (on behalf of Bloor and Taylor Wimpey) and Shropshire Council and sets out those points of agreement, and any key points of disagreement, in relation to the draft Tasley Garden Village allocation (BRDO30) and the development strategy for Bridgnorth. It is agreed that there are no identified areas for additional work required to support the Local Plan and draft allocation.

¹ Bloor/Taylor Wimpey assumed final completions in 2035/36. Shropshire Council assumed final completions in 2037/38.

Appendix 3

through the design of catchment areas and infiltration and conveyance features. Attenuation features include swales and basins, which will be a dry facilities most of the time, and which also propose the provision of multi-functional green/blue spaces including benefits for residential amenity and the environment of the Site.

- Development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, which will form part of the Green Infrastructure network

The proposed development avoids siting dwellings within Flood Zone 2 or 3, provides a green network with 10% BNG, integrates existing trees and hedgerows and provides pedestrian links through the Site.

North West Relief Road (NWRR)

- 5.3. The North West Relief Road (NWRR) is currently subject to a planning application (ref: 21/00924/EIA). The description of development is:

'Construction of 6.9km single carriageway (7.3m wide) road; severance of local roads and footpaths; provision of combined footway/cycleway; erection of three bridged structures over carriageway; diversion of existing bridleway/footpath via an underpass; climbing lane on westbound approach; 670m long viaduct; bridge over railway; two flood storage areas; provision of two new roundabout junctions and improvements to two existing roundabouts; associated traffic calming measures, landscaping and drainage schemes.'

- 5.4. It is agreed in principle between the Parties that 150 dwellings of the 450 dwellings allocated to be delivered on the Site could be delivered prior to the NWRR being operational without having a severe impact on the highway network. In this regard the outline planning application proposes a phased approach to delivery of the Site. The Transport evidence provided with the current application identifies the potential for a phased delivery where 150 dwellings could be delivered ahead of the NWRR coming forward.
- 5.5. The Transport Assessment (TA) which supports the current outline planning application for the Site has been prepared in accordance with detailed pre-application discussions with Shropshire Highways Officers, to determine the scope of works that have been undertaken and agree the modelling and specific junction considerations that have informed the TA. Shropshire County Highways has a strategic highways model in place to model cumulative impacts of all development proposed in the emerging Local Plan and the applicants are currently working with highways to utilise the model to support the planning application.

Viability and Deliverability

- 5.6. The Promoter proposes an indicative trajectory for the delivery of the proposed site allocation on the land west of Ellesmere Road as follows:
- Outline Planning Permission granted – 2024
 - Site Sale, Reserved Matters Approvals and Discharge of Conditions – 2025

- Lead-in and 50 dwellings completed – 2026
- 100 dwellings completed – 2027 (target NWRR opening year)
- 100 dwellings completed – 2028 (plus delivery of Local Centre)
- 100 dwellings completed – 2029
- 100 dwellings completed – 2030

5.7. Shropshire Council has undertaken some detailed Viability work to inform the emerging Shropshire Local Plan. This is included in submission document EV115.01-03 and updated Viability Note GC49 in June 2024. The Promoter made Representations to the Local Plan Delivery & Viability Study pre-consultation draft in February 2020, and notwithstanding those comments, it is the Promoter's view that the Site can be viably delivered.

5.8. There are no known impediments to the viability of the Site, subject to the CIL payment and Section 106 contribution negotiations which are unknown at the time of writing.

Appendix 4

From:
To:
Cc:
Subject: RE: Viability and Deliverability of Site Promotions
Date: 24 November 2020 12:56:41
Attachments:

Hi Dan

I'm pleased to confirm as follows –

- PON008. The site is viable and deliverable and the identified timescale is correct
- SHR057 and SHR177. These sites are viable and deliverable and the timescale is correct
- SHF013. The site is viable and deliverable but the timescale is likely to be short term rather than medium term
- SHF022. The site is viable and deliverable and the timescale is correct
- FRD011. The site is viable and deliverable but the timescale is likely to be short term rather than medium term
- OSW017. The site is viable and deliverable and the timescale is correct

We have been in constructive discussion with the owners of site but do not have a firm agreement with them. However we understand they are keen to see this site progress and believe it to be viable and deliverable on the identified timescale.

We also have an interest in ELL005 which I think you may have already asked about. However for the avoidance of doubt I can confirm this is viable, deliverable and that we hope to commence development in 2021.

Best regards,

Howard Thorne

Shropshire Homes Limited

Appendix 5

development costs anticipated for any aspect of supporting infrastructure and the developer considers that all necessary infrastructure is achievable without impacting on viability.

9. 'Is the site realistically viable and deliverable?'

- 2.22 It is apparent that the site has strong development potential and there are no significant site constraints which would add abnormal costs and impact on viability. The site is located in a desirable suburban location on the periphery of Whitchurch, with good connections to the town centre. There is an evidenced need for more homes in the locality and the Local Plan Delivery and Viability Study (Ref: EV115.01) confirms that that average price paid for a dwelling in Whitchurch from 2018 to 2020 sat just below £250,000, indicating strong recent market performance in the locality. The site has been identified by the developer, an experienced housebuilder with commercial awareness, as a site which should be pursued. There is nothing at this stage to suggest that the site is not realistically viable, with the ability to withstand proportionate developer contributions and the provision of the necessary affordable housing and open space on site.
- 2.23 The three landowners who are responsible for the land which makes up the allocation are working proactively to bring the site forward for development and Castle Green Homes have option agreements in place for future procurement of the land. As such, the land must be considered as readily available and seen as a practical development opportunity.

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

- 2.24 Castle Green Homes envisage that a start on site with preparatory works would be achievable by June 2025, with the dwellings delivered subsequently at a rate of 40 dwellings per annum from January 2026. This would mean that all homes would be projected to be delivered by January 2031, comfortably within the short and medium term within the plan period. Castle Green Homes have already undertaken preliminary site assessment and scoping works, allowing for a shorter turnaround time to submit a planning application upon allocation of the sites.
- 2.25 The WHT044 section of the joint allocation includes the location where the main vehicular access to the site will be taken from and is not dependent on the WHT037 area for development. This allows the site to be developed logically as the WHT044 section of the site could be developed as a first phase, allowing the properties to be delivered and occupied independently of the wider allocation.
- 2.26 Castle Green Homes are an experienced developer, with decades of experience delivering homes in North Wales and the North West of England. The above timescales are projections based on the company's expertise gained across years of experience in the sector. There are no abnormal site constraints or infrastructure requirements which would indicate that the delivery rate would differ substantially from other comparable sites delivered by Castle Green Homes in the past. In addition,

the allocation is not tied to any wider development proposals for delivery and can come forward for development independently, decreasing the degree of uncertainty in the projected timeline.

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

- 2.27 Much of the boundary is appropriate by default as it follows the border of where agricultural fields meet residential development at the edge of the settlement. The boundary ensures that the allocated sites are immediately adjacent to the built-up area of Whitchurch and are not isolated from the settlement. The northern edge of the boundary rounds off the settlement of Whitchurch and avoids any isolated edge of settlement ribbon development. The allocation boundary avoids intrusive harmful extension into open countryside and minimises any impact on more sensitive open areas surrounding Whitchurch.
- 2.28 The land under the control of Castle Green Homes differs marginally from the allocation area in the northern corner where the allocated site comes to a point to the north-west of Badger Crescent and The Squirrels. The allocation area includes only part of a rectangular parcel of agricultural land which our client controls all of. However, it is not envisaged that there will be any built development in this area of the site, which has been indicatively proposed as a flood storage area.

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

- 2.29 The detailed policy requirements as set out in *Schedule S18.1(i). Residential Allocations: Whitchurch Principal Centre* of the draft plan outline overarching development management requirements for the delivery of the site relating to design and layout, drainage, noise, access, highways and green infrastructure. These requirements ensure that due consideration will be given to these factors but avoid creating overly specific and prescriptive requirements, providing the developer with flexibility to achieve these aims in a practical and implementable way.
- 2.30 The accompanying access appraisal undertaken by Prime Transport Planning demonstrates that the site is able to be served by a single vehicular access from Chester Road. The wording of the policy outlines that there is potential for two site accesses but does not require this, again leaving the developer with an appropriate degree of flexibility to develop the site access arrangements as appropriate.
- 2.31 The policy requirements ensure that the tests outlined in NPPF paragraph 35 have been met and that the allocation and accompanying policy should be considered 'sound' for inclusion in the adopted Local Plan.

Appendix 6

Shropshire Local Plan Examination (Block 2)

Matter 7 Hearing Statement on behalf of Wain Estates (ID: A0357)

Albrighton Place Plan Area (Policy S1) - see MMs 076-079

1. Is the approach taken to development in the Place Plan Area, justified, effective and consistent with national policy?

- 1.1 Wain Estates supports the approach taken to the Place Plan Area, including the identification of Albrighton as a Key Centre, which will contribute towards strategic growth objectives in the east of the County. The Pre-Submission Version of the Local Plan has identified a residential guideline for Albrighton of 500 dwellings which is to be met principally by one allocation, in addition to other completions and commitments.
- 1.2 The Council's Hierarchy of Settlements paper (August 2020) (EV060) reviews all settlements within the authority and establishes a settlement hierarchy based upon the sustainability of all settlements. As part of this assessment, settlements are assessed for their provision of primary and secondary services, transport and employment opportunities.
- 1.3 In this assessment Albrighton clearly emerges as a highly sustainable settlement and is acknowledged to have good access to services. Overall, the Hierarchy of Settlements study scores Albrighton 94 out of a possible 116 total points for sustainability. The settlement provides a wide range of services which meet not only the day to day needs of its residents but also those of the surrounding rural and urban catchment. The identification of Albrighton as a Key Centre is therefore considered to be sound.
- 1.4 Wain Estates supports the identification of development guidelines for categorised settlements such as Albrighton. The housing figures clearly seek to acknowledge the sustainability of such settlements, as well as the requirement to meet the needs of small settlements for new housing and sustain the existing services. Wain Estates supports the approach and acknowledges that site allocations provide certainty for all parties.

ALB017 & ALB021 - Land north of Kingswood Road and Beamish Lane, Albrighton

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

- 1.1 Shropshire Council has undertaken an assessment of a range of promoted sites for possible allocation in the Pre-Submission Version Local Plan. The detail of this assessment is included in the following evidence base documents:
 - Shropshire Council Local Plan Review 2016 - 2038 Preferred Sites Sustainability Appraisal (December 2020) (SD006.3)
 - Site Assessments: Shrewsbury Place Plan Area (December 2020) (SD006.18)
 - Shropshire Council Strategic Land Availability Assessment (November 2018) (EV106)

- 1.2 The Stage 3 Assessment included within SD006.18 identifies that sites ALB017 and ALB021 are considered to be 'achievable', 'available' and 'viable'. The assessment concludes that the sites are well related to the settlement within an area of safeguarded land identified to meet Albrighton's future development requirements and comprises a natural direction for expansion. Wain Estates fully supports the allocation of site ALB017 in conjunction with site ALB021 and considers the allocation to be an appropriate strategy which is sound.

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

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

- 1.3 As noted below at Question 4, an outline planning application has been submitted for the draft allocated site ALB017. The proposals are for up to 150 dwellings.
- 1.4 The applicant has undertaken a testing exercise which confirms that the submitted Site Plan can accommodate 150 dwellings, 20% of which will be affordable housing.
- 1.5 The proposed housing mix is in line with emerging policy and reflective of local needs. In line with Policy DP1, 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings) standard.

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

- 1.6 In July 2024 an outline application was submitted for the entirety of the ALB017 draft allocated site (Ref: 24/02662/OUT), with the following description:
- "Outline application for the erection of up to 150 dwellings with associated infrastructure and the principal means of vehicular access from Kingswood Road only (all other matters reserved)"*
- 1.7 The application is supported by a full suite of technical documents which demonstrates that the site is suitable. The application is the subject of a PPA and remains pending.
- 1.8 The application excludes the area defined as ALB021, which is in the control of another party, but has been designed with regard to delivery of both parts of the allocation.

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

- 1.9 There are numerous socio-economic and environmental benefits which would arise from the proposed development. These can be summarised as:
- The provision of new high quality market housing in a sustainable location;
 - The provision of a policy compliant level of affordable housing in an area where there is unmet need;
 - The scheme would deliver formal/informal greenspace and play space for use by new and existing residents with its long-term management secured;
 - The development will improve connectivity and access to PRoWs;

- The ecology of the site will be improved through the provision of new green infrastructure which will exceed the necessary 10% net gain in biodiversity;
- Creation of employment opportunities through the construction phase of the development;
- The proposed development will significantly increase the number of economically active residents, boosting income and local expenditure.

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

- 1.10 As with any site located on a greenfield site, urbanising development will introduce changes to the area. However, the submitted LVIA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts.

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?

- 1.11 The planning application is supported by a Flood Risk Assessment (FRA) which confirms that the site is located entirely within Flood Zone 1 and is at a low risk from surface water flooding. The Sequential and Exception Test (EV094) has therefore not had to consider this site.
- 1.12 The FRA outlines how the SuDS Hierarchy has been implemented and confirms that the proposed drainage scheme implements infiltration-based methods of surface water disposal. The proposed surface water drainage features are designed to store the volume of water associated with a 1 in 100-year rainfall event, plus an additional allowance to account for increased rainfall due to climate change. The existing ponds on site will also be retained and a landscaped easement provided.
- 1.13 The FRA has therefore confirmed that the site is suitable for residential development without being subject to significant flood risk. Moreover, the development will not increase flood risk to the wider catchment area.

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

- 1.14 Infrastructure requirements can be addressed through payment of CIL and any requests for planning obligations which meet the requirements of the CIL tests.

9. Is the site realistically viable and deliverable?

- 1.15 Wain Estates have undertaken a viability exercise which considers the costs of developing the site and consider that the site is viable and deliverable.

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

- 1.16 Table A7 of the Pre Submission Version identifies delivery within the Short Term (2020/21-2024/25) and Medium Term (2025/26 - 2029/30). Wain Estates support this assessment.

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

- 1.17 The allocation boundary is appropriate and can accommodate the allocated development and the necessary mitigation.

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

- 1.18 The Development Guidelines (as amended) are considered to be sound and have been addressed through the planning application.

Contact

Mike O'Brien



Appendix 7

- 2.9 The site is therefore considered to be a logical extension to the north of Market Drayton and represents a sustainable allocation for residential development.

Q2. What is the scale and type/mix of uses proposed?

- 2.10 The site extends to 4.55ha and is allocated for residential development comprising approximately 125 dwellings. Infrastructure improvements extending beyond the site are required as part of the allocation policy in relation to new sections of footway and the introduction of a signal-controlled pedestrian crossing on the A53 western arm of the roundabout.

Q3. What is the basis for this and is it justified?

- 2.11 The proposed quantum of development reflects a density of approximately 27 dwellings per hectare. This is readily achievable as the site is generally flat and free of any major constraints.
- 2.12 The scale of development allows for delivery of a mix of housing alongside public open space, sustainable drainage and retention of key trees and hedgerow. The site is considered to be suitable for residential development and can deliver a suite of benefits both on and off site. The proposed scale and residential use of the site in a sustainable location is considered to be appropriate and will support the delivery of much needed market and affordable housing, alongside local highways improvements.

Q4. What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 2.13 The site currently has no planning permission. However, a full planning application for 126 dwellings was submitted jointly in the names of Bellway, SLG and the landowner in November 2022 (LPA ref: 22/05309/FUL). The application was refused in July 2024 for one reason relating solely to the detail of the proposed layout design, particularly in respect of open space provision. The applicant is currently considering whether to appeal against the recently refused application. If an appeal is not submitted, then the site will be the subject of a further full planning application in the short term.
- 2.14 The refusal of planning application 22/05309/FUL related to a disagreement between the applicants and the Council over a detailed design issue, which should have no bearing on the principle of the allocation or the proposed quantum of development. It is considered that an acceptable scheme can be achieved for approximately 125 dwellings.



Q5. What are the benefits that the proposed development would bring?

2.15 The benefits derived from development on the site can be summarised as follows:

- Delivery of market housing to meet local needs, including delivery within the first 5 years of the plan. This site can deliver early in the plan period, whereas the other sites in Market Drayton may come forward later in the plan period.
- Delivery of much needed affordable housing to meet very significant needs in Market Drayton and across Shropshire.
- Provision of M4(2) and M4(3) adaptable and accessible dwellings, including the potential for maisonettes.
- The promotion of active and sustainable travel modes, benefitting both existing and new residents, through the proposed highway improvements including to the A53 roundabout and improved pedestrian and cycleway connectivity.
- Provision of a 10% biodiversity net gain in habitat and hedgerow units.
- Provision of quality open space to the north of Market Drayton.
- Economic benefits during the construction phase and then through increased household expenditure to local businesses during the lifetime of the development.

2.16 Overall, it is considered that the site can deliver a wide range of benefits which will positively impact both the existing locality and future residents of the development.

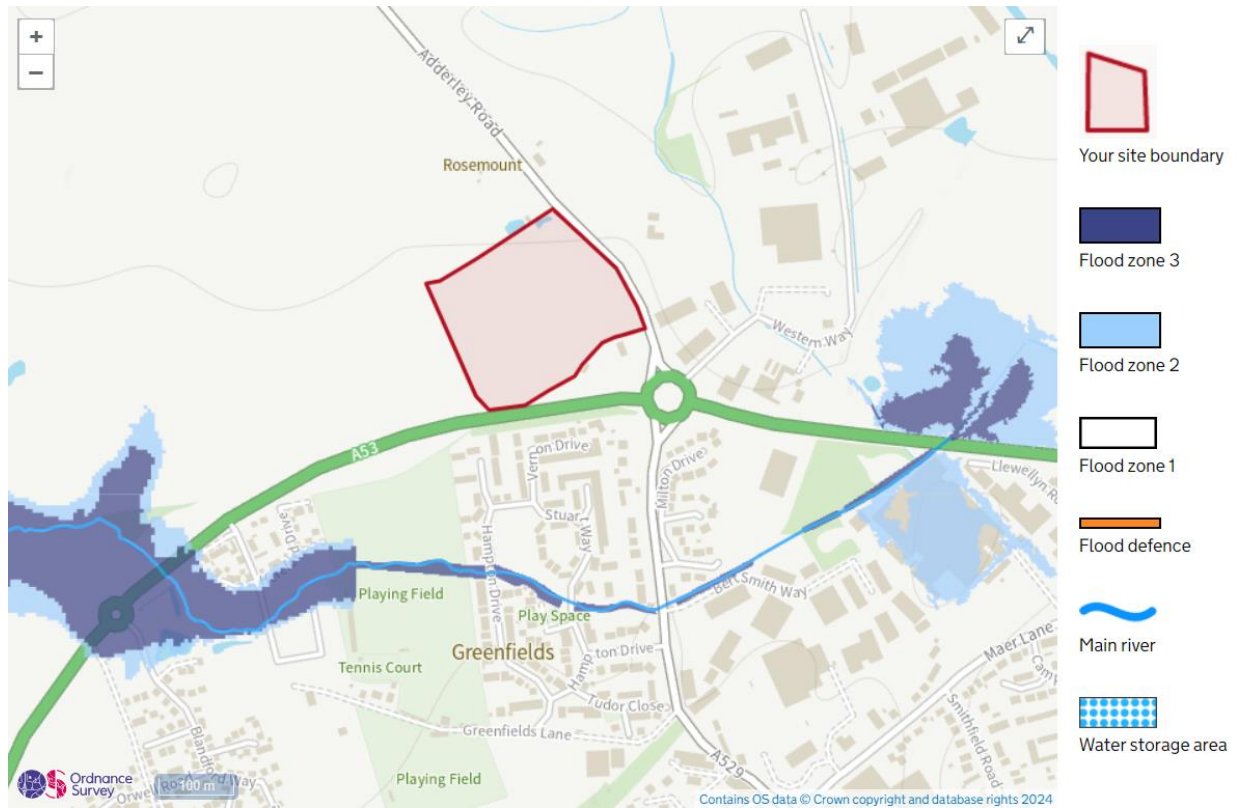
Q6. What are the potential adverse impacts of developing the site? How could they be mitigated?

2.17 The site located adjacent to the A53, A529 and an employment site, which are all sources of noise in the immediate vicinity of the site. The draft policy requirements for allocation MDR006 set out that appropriate mitigation will be required to manage the noise arising from these sources. Noise assessments carried out in connection with application 22/05309/FUL found that acceptable internal noise levels can be achieved through appropriate glazing and ventilation, and any noise related issues were resolved through the application. It is also considered unlikely that noise from commercial units at the employment site would impact upon development of the site or prevent development from coming forward.



Q7. 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?

2.18 The site is within Flood Zone 1 and therefore the risk of flooding is low. An extract showing same is provided below.



- 2.19 The Sequential and Exception Test Report (EV094) concluded that the site was not required to be assessed again through a Level 2 assessment.
- 2.20 A site-specific Flood Risk Assessment (FRA) was carried out in connection with full planning application 22/05309/FUL. A surface water attenuation basin was proposed as part of a sustainable urban drainage system, along with a foul pumping station, in accordance with the requirements set out for the allocation in Schedule S11.1(i) and Policy DP21 (Flood Risk).
- 2.21 The FRA demonstrates that a scheme can be delivered on site with appropriate flood risk and drainage mitigation. The proposals were assessed by the Environment Agency (EA) and the Local Lead Flood Authority (LLFA). Neither consultee objected to the application.

Q8. What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

2.22 The following infrastructure is required in accordance with the draft allocation Policy S11.1(i) (MDR006) and can be viably delivered on the site:

- A priority-controlled junction to allow vehicular access into the site.
- Highways, cycle and pedestrian improvements at the A53 / A529 Adderley Road roundabout. The development would comply with emerging Policy DP28.
- Provide Green Infrastructure to introduce a buffer between the development and adjacent ponds.
- Provide appropriate mitigation measures to manage the noise arising from the A53, A529 and Sych Farm.
- Sustainable drainage system, flood and water management measures.

2.23 As demonstrated by the recent planning application, the proposed development would be able to viably deliver the above benefits.

2.24 Having regard to other physical features, an existing line of trees and hedgerow runs north to south through the site. The development could be delivered with minimal impact to these features or be appropriately mitigated where it is not possible to retain them through additional planting.

2.25 It is also possible for the existing pond situated to the northeast corner of the site to be retained and enhanced as part of a residential scheme.

2.26 To conclude, the infrastructure requirements set out in Schedule 11.1(i) would not prevent development from being delivered on the site and all other constraints can be appropriately addressed through mitigation measures. This was demonstrated through the planning application (22/05309/FUL) which proposed a viable scheme incorporating all of the abovementioned measures into the proposals.

Q9. Is the site realistically viable and deliverable?

2.27 Yes, the site is viable and deliverable.

2.28 The work undertaken to date through application 22/05309/FUL has demonstrated that an acceptable scheme can be viably accommodated on the site. No constraints exist which would render the development unviable and prevent the site from coming forward.



2.29 The site is also promoted by SLG, an experienced strategic land promoter. The site is being actively promoted, and there are no legal or ownership constraints to delivery.

Q10. What is the expected timescale and rate of development and is this realistic?

2.30 As the recent full planning application demonstrates, the site is being actively progressed and is deliverable within the next 5 years. We agree with the timescales set out in the Five Year Supply Statement (GC47) which indicates that first completions will take place in 2025/26.

Q11. Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.31 Yes, the boundary of the site is appropriate. It forms a logical extension to the settlement and follows the existing field boundaries. It is bordered to the south by the A53 and an existing dwelling (known as Westways); to the east by the A529 with the Burnside Business Park / Western Way employment area, a dwelling (known as The Woodland) and agricultural fields; to the north by agricultural fields with an existing dwelling (known as Rosemount) beyond; and to the west by agricultural fields. It is not considered that any amendments are required to the site boundary.

Word count: 1,863



Appendix 8

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

1.1.19 The technical work underpinning the outline planning applications submitted in respect of MDR039, and the consultation responses received from consultees during the application processes, have identified the infrastructure requirements associated with bringing forward the site for housing. Furthermore, the broad costings for delivering the required infrastructure are known to Gladman.

1.1.20 As has been set out above, the physical and other constraints to development are known; and are minimal. There are no insurmountable constraints to the development of the site for housing, as proposed.

Question 9: Is the site realistically viable and deliverable?

1.1.21 Gladman has a good understanding of the costs associated with delivering necessary infrastructure, securing mitigation and meeting the policy requirements associated with bringing forward a high quality housing development at the site; and can confirm that the site remains viable and deliverable.

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

1.1.22 As a broad matter of principle, Gladman is in a position to prepare and submit a planning application; and secure planning permission quickly. The site is available and deliverable and has the potential to deliver a significant number of dwellings within a 5 year period.

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

1.1.23 The boundary of MDR039 is considered appropriate and is logical, having regard to land ownership and existing physical features. There is no justification for amending the boundary.

Appendix 9

of Hazelwells Road in a future Local Plan period to provide a new highway link road to take congestion off Woodhead Road and improve Highley's road network.

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

This is an edge of settlement location and so the landscape impacts of this will need to be considered with care. In landscape terms, the east side of Highley is less sensitive than the west in relation to views to and from the South Shropshire Hills Area of Outstanding Natural Beauty (AONB). A Landscape and Visual Impact Assessment in support of any subsequent planning application may help inform the landscape design and any mitigation required.

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?

The proposed allocation is within Flood Zone 1 and is therefore at the lowest risk of flooding and sequentially the site is therefore acceptable for development.

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

The development will be accessed via the junction arrangements undertaken by adjacent development approved under reference 20/00193/OUT. The recent consent for 20 affordable homes includes an adoptable road 5.5 metres wide and a suitable junction with the B4555 Bridgnorth Road. Access to the site would be via this adoptable road.

9. Is the site realistically viable and deliverable?

Yes, the site is a greenfield site with minimal constraints. It is viable and can be delivered.

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

The site is immediately available. It can be delivered early within the plan period.

Appendix 10

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

- 2.4 The reason for the reduction is explained within the Development Guidelines, namely:
- Delivery of green space to the north-west, including recreational / parkland with structural planting linking to Tenbury - Bewdley rail line, protecting significant habitat and mitigating any biodiversity impacts
 - Delivery of green infrastructure to the north-west and south-east of the site will improve the character of this large prominent site. These open areas will 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.
 - Open space to the south and east will accommodate the SuDs, de-culverted watercourse and land for 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.
- 2.5 Once these areas of public open space are provided, and whilst retaining an attractive character and design, there is sufficient room for circa 100 dwellings as a guideline. However, as set out previously the final quantum of development will best be established through the submission of a suitable planning application with localised, site specific, detailed evidence. This may result in an application for more or less units, but given the allocation is only a guideline, this should not be deemed as unacceptable as the NPPF places a responsibility on parties to make effective use of development land.

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

- 2.6 The site is under the control of an experienced residential land promotor (Lone Star Land). Work towards the submission of a planning application has commenced, including pre-application advice with the Council and formal Design Review (undertaken by Design:Midlands). An outline application will be submitted in due course, providing the framework and certainty for the site to be marketed and sold to a housebuilder who can deliver their product through subsequent reserved matters applications. At this stage, subject to timely determination of submitted applications, we anticipate delivery within the 5-year period post adoption.

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

- 2.7 The proposed development would bring a range of benefits, both locally and district level. The development would deliver 100 dwellings, including a suitable mix of sizes and typologies, including

affordable housing in accordance with adopted policies. The delivery of housing in both the context of the NPPF and wider governmental aims should be afforded significant weight.

- 2.8 The site also provides wider benefits in terms of the provision of new, high quality public open space, designed to respond positively to the site's constraints and opportunities. This will provide attractive environments for both new and existing residents to enjoy, including new areas of amenity space, a LEAP (on a suitably overlooked, accessible and safe part of the site) and new walking routes. This provision of high-quality spaces will encourage people to live more active, healthier lifestyles.
- 2.9 The site will provide a range of ecological benefits beyond the basic requirement of BNG, albeit this is still considered to be a benefit. This includes the creation of attractive new habitat including the site's attenuation features. A specific localised opportunity provided through the development of this site includes the opening up of an existing culvert to the eastern part of the site. This will be a demonstrable benefit in terms of amenity, watercourse hierarchy (particularly in terms of maintenance and flood alleviation) and also ecology.
- 2.10 The site is sustainably located, with a range of employment opportunities, services and facilities within walking distance of the site, in both Burford and Tenbury Wells. Public transport is accessible at existing bus stops on A456, a 3minute walk from the site. These stops are served by the 291 bus service, which provides a regular service to Kidderminster and Bewdley via surrounding towns and villages.
- 2.11 The site is considered therefore considered to be sustainable and suitable for development, bringing a range of benefits beyond that which could be achieved on other sites.

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

- 2.12 As set out in respect of Questions 2 and 3, both the Council and the site promotor have a strong understanding of the site's context, opportunities and constraints, and this has informed the Council's draft guidance for the site, and the approach adopted in respect of the illustrative masterplan. This has been refined through both pre-app and design review, both of which had technical input from Officers, consultees, and technical experts employed by Design:Midlands. It is through this understanding that the capacity of the site has been reduced, to enable sufficient room on the site for mitigation, predominantly in the form of target areas of open space to help the site assimilate into the landscape and have sufficient regard for key constraints, such as heritage. This

diligent work has resulted in a scheme which can be advanced without undue impact, whilst still delivering an important contribution of new homes.

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?

- 2.13 The site is located entirely within Flood Zone 1 (Low Probability). An unnamed ordinary watercourse is located within the eastern portion site; this is culverted through much of the site, before passing under the A456 and eventually discharging into the River Teme. A key benefit of the current proposals is that this water course will be de-culverted, providing a host of amenity, ecology and watercourse hierarchy benefits.
- 2.14 The majority of the site is also at very low risk of surface water flooding. Areas of low (1 in 1000-year) to high (1 in 30-year) surface water flood risk are present along the unnamed ordinary watercourse corridor and along the southern site boundary. It is noted that as part of the design review, Design:Midlands had a flood risk expert as part of their team, in acknowledgement of the need to be robust on this matter.
- 2.15 The baseline results of initial hydraulic modelling indicated the potential for pooling in the south of the site, predominantly driven by limited capacity within the existing culvert on the unnamed ordinary watercourse adjacent to the site. Hydraulic modelling of post-development options/mitigation will have been undertaken to inform the site layout and the need for on-site attenuation measures. This resulted in a need for an additional basin to manage the outflow to this culvert. As a result, surface water drainage will be appropriately sized and accounted for within the site layout, with consideration to flood risk both now and in the future (including adjustments for climate change).
- 2.16 New built development will be located way from these areas. The schemes layout and drainage strategy will ensure both that proposed development will be safe from flooding, and flood risk will not be increased elsewhere.
- 2.17 The work to date demonstrates there is a strong understanding of the site in respect of Flood Risk. The site is located within Flood Zone 1 and whilst there are localised areas of Surface Water flood risk acknowledged through hydraulic modelling, these will not impact any areas of built form and will be entirely mitigated through the provision of additional sustainable drainage features, namely an additional attenuation basin. On the basis of the above, there is no need to undertake the sequential/exception test. Moreover, the scheme improves the localised drainage hierarchy through

the de-culverting of the watercourse. Should it benefit the examination, the evidence can be provided, but this has already been shared with the Council and Design:Midlands as part of pre-application work.

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

- 2.18 The full infrastructure requirements and costs will be established through the submission of the planning application, which will ensure necessary payments to local public services if there is a lack of capacity. There is however a very strong understanding of the site's physical and other constraints, as set out in these representations and previous submissions, and work is well advanced in development of a scheme which responds to these positively, and in a manner which helps develop place character and identity, contributing the to development of an attractive scheme. For example, in accordance with the comments of offices, Design:Midlands and the project team, the proposals will include large areas of new public open space, provided across the site, ensuring all new residents benefit from ready access to these areas.
- 2.19 This examination can take full confidence in the process that has been undertaken to date in respect of the development of proposals, including pre-application and design review, to ensure the delivery of a scheme which delivers a significant quantum of dwellings (circa 100), whilst mitigating its constraints in a positive way.

9. Is the site realistically viable and deliverable?

- 2.20 Yes, whilst full details of development contributions are still being established, there is a good understanding of the works needed to physically deliver the site, including measures such as the de-culverting of the water course, and having regard for anticipated values it is not considered that there will be an issue in terms of site viability or deliverability. Our anticipation is there will be strong market interest in the site, with full appreciation of likely costs as will be apparent after approval of an outline consent, and given land supply shortages housebuilders will be keen to develop the site in the near term, in a policy compliant manner.

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

- 2.21 Having regard for the progress made towards an application, we believe that the published trajectory is now likely to underestimate the contribution of the site, particularly with delivery in the initial Plan Period. We can confirm that submission of an outline application is imminent. From the grant of Outline permission, we anticipate 1 year for approval of Reserved Matters and conditions, followed

by 9 months for sales. Whilst the first year of delivery may be lower, we anticipate annual delivery of 40-50 dwellings per annum. Assuming timely approval of the applications, we consider the below trajectory is deliverable, assuming the Local Plan is adopted next year, (thus the base year for 5-year housing land supply calculations), we believe the following is a reasonable trajectory for the delivery of the site reflecting an understanding of the progress made towards an application and reflecting key evidence on similar site typology deliver as articulated above. The base date is considered robust, particularly having regard for Matthew Pennycook MP's letter to the Planning Inspectorate (July 2024) which sets out that Local Plan examinations need to be expedited where possible, though clearly if the Local Plan is adopted the following year the implications for delivery are clear.

Year	2025/26	2026/27	2027/28	2028/29	2029/30
Site progress	Approval of submitted Outline	Approval of Reserved Matters Application/ Conditions	20	40	40

- 2.22 Both the lead in time and build out rate is considered to be robust. This is supported by research undertaken by Lichfields through their published Start to Finish 3 (March 2024) which sets out 35-60 dwelling per annum can be anticipated for sites of this scale (lower to upper quartile of sample sites that formed the study). Whilst the application determination is slightly expedited when compared to Start to Finish assumed average, this is a reflection on the significant progress and work done so far, including pre-application and design review, which has essentially frontloaded some of the work that may otherwise be undertaken during the determination period.

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

- 2.23 Yes, the boundary of the site is appropriate and logical, reflecting land ownership and also to facilitate the benefits of the proposed development, including de-culverting of the watercourse. All parties are in agreement (the Council, the promotor and Design:Midlands (who undertook the design review)) that the defined site area is appropriate and can achieve all cited aims of the draft Local Plan site guidelines.

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

- 2.24 Yes, Lone Star Land support the proposed detailed site requirements and consider them all to meet the NPPF's tests of soundness. In particular they are justified when compared with potential alternative approaches, particularly given the need to reflect localised opportunities and constraints which have been developed through evidence collated by the Council and by the site promotor. They are considered to be effective, particularly in that the work that has been undertaken to date, including comprehensive design review, support the guidelines within the site-specific policy. As articulated above, the site is considered to be viable and deliverable, including the specific guidance. Finally, they are considered to be consistent with national policy, particularly in that like the NPPF they weigh up the development of land for much needed housing, whilst retaining focus and appropriate weight to issues apparent within the Framework, such as heritage and flood risk.

Appendix 11

Regulation 18 Pre-Submission Draft of the Shropshire Local Plan

Land between the A53 and Poynton Road, Shawbury - SHA019 Representation on Behalf of (Landowners)

1. Introduction

1.1 This response seeks to support the allocation of site SHA017

2 Consideration of Previously Submitted Information

2.1 It is requested that the previously documents submitted as part of the 'Preferred Sites Consultation – February 2019' are considered in the context of the current Regulation 18 Pre-Submission Draft of the Shropshire Local Plan.

2.2 The following documents are attached:

- Supporting Statement dated February 2019
- Confidential Letter dated 8th February 2019

3. Support for Allocated Site SHA017 within the Shawbury S17 Inset

3.1 The Regulation 18 Pre-Submission Draft of the Shropshire Local Plan suggests within the Development Guidelines on page 276 that the scheme would accommodate 80 Dwellings.

3.2 The scheme will respond to the specific points within the Development Guidelines as follows:

- The site will be developed in 2 Phases (around 40 in each Phase)
- Access to the SHA019 land would be via the new roundabout on the A53 through the existing Lioncourt development site 'Oaklands Park' (Local Plan Allocated site SHAW004 and approved application 16/05474/FUL). The new roundabout is designed with the capacity to accommodate the level of development proposed across the whole site and the roads within the site would be to Shropshire Council adoptable standard
- No vehicular access will be provided from Poynton Road, the Paddocks or Hazeldine Crescent.
- A pedestrian footway will be provided along the site's eastern boundary, connecting to the existing footway on Poynton Road.
- The development will support the delivery of a footpath link, along side appropriate infrastructure including lighting and secure fencing, to support

enhanced connectivity to St Marys Primary School and to ease congestion on Poynton Road.

- Existing trees, hedgerows and priority habitats will be retained and enhanced
- Development will reflect and respect the sites heritage and heritage assets within the wider area. Contributions will be provided towards the consolidation, conservation and interpretation of the Grade II listed brick kiln and associated structures west of the site.
- Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from nearby commercial activities and roads.
- The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.
- Drainage improvements have been discussed with the Councils Drainage Team with sketch details attached as Document 1 showing a suggested improvement to the existing culvert running under Poynton Road, which is identified as causing localised flooding across Poynton Road. This improvement scheme would form part of the Drainage Strategy for the site

3.3 As noted in the previous consultation response the site is:

3.2.1 Sustainable

The site lies within a highly sustainable location close to Shawbury centre and its services and facilities

3.3.3 Available

The site lies within 1 ownership which simplifies availability and delivery. The land is currently let out for grazing and available for immediate development.

3.3.4 Viable

Lioncourt Homes have developed the Phase I site for 50 houses (Adopted Local Plan Allocation SHA004). They have found that the market for housing within Shawbury remains strong due to the good range of services and facilities, the RAF Shawbury base and proximity to Shrewsbury.

The site is viable and capable of coming forward as part of the Local Plan Review process

4. Forecast of Delivery Timescales for Local Plan Allocations

- 4.1 The Local Plan Review Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations, refers to anticipated timescales of development coming forward.
- 4.2 It is anticipated that the Phase 1 site will come forward in the 'Short Term' (2020 to 2025) with the following time constraints:

Phase 1

Spring 2022	Local Plan adoption
Summer 2022	application submitted
Spring 2023	expected decision
Summer 2023	expected on site
Autumn 2024	expected completion

- 4.3 It is anticipated that the Phase 2 site will come forward in the 'Medium Term' (2025 to 2030) with the following time constraints:

Phase 2

Spring 2022	Local Plan adoption
Autumn 2023	application submitted
Summer 2024	expected decision
Autumn 2024	expected on site (tie in with end of Phase 1)
Spring 2026	expected completion

- 4.4 In accordance with the NPPF definition, the site is available now, offers a suitable location for development now, and its development is achievable with a realistic prospect that housing will be delivered on the site within five years.

5. Local Community Comments

- 5.1 The 'Shawbury Community Page' on Facebook has included comments about the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan.
- 5.2 The information below was posted on the 17th September with a view to obtaining objections. It is unclear why (having reviewed the consultation and provided links) that their information was incorrect (reference to 90 house instead of 80 houses and supporters of the previous scheme coming from outside Shawbury which is false):

Shropshire local development plan
 September 30th is the deadline for consultation on the shropshire development plan.
 For shawbury this involves an additional 90 house development on a link Road behind the current lioncourt homes development.
 The links below take you to the plan and to the consultation documents parts A and B which need returning in order to express Any views.

Previously on the current lioncourt development plan it was clear that planning comments came in from non shawbury residents linked to the developers who don't have an on the ground understanding of issues relating to the local community. Attached are the proposed development fields

- 5.1 The Facebook post did stir some comments with some negative and some positive and some not factually correct. A copy of the discussion is attached as Document 2. The names have been shortened to the responders initials for privacy reasons.
- 5.3 Whilst some of the comments are negative some are positive. However it is unlikely that these positive responders will ever take the time to complete the form and respond to the current Regulation 18 Consultation. Some of the positive comments are:

I wonder where some of these moaners children will live when they get older? Unless they are fortunate enough to buy an older house, chances are they may have to resort to one of these newly built homes their parents despise so much!

I think they should build 200 houses ... and another pub

Loads of work. Helping familys pay there bills and helping the local shops and business. Dont know what peoples problem is. Anybody would think you lot own the village 🤔🤔🤔

The bit missing from the main description is that this plan covers the period to 2035 and should lock the permissions till then. Also remember this is only land available (for in this case 90 homes), but what is built is still subjected to various processes including planning. If it happens and that could be at anytime up to 2035.

It's not just happening to shawbury but all surrounding villages Ford have 90 more houses been given the go ahead pontesbury have a huge new housing currently being built What ever nearest village to Shrewsbury will be ear marked for further development

- 5.4 It is clear that there is support within the community of Shawbury for new houses.

6. Conclusion

- 6.1 The Promoters and Landowners support the site allocation SHA017 for Shawbury as shown within the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan

Appendix 12

From:
To:
Cc:
Subject: RE: Viability and Deliverability of Site Promotions
Date: 24 November 2020 12:56:41
Attachments:

Hi Dan

I'm pleased to confirm as follows –

- PON008. The site is viable and deliverable and the identified timescale is correct
- SHR057 and SHR177. These sites are viable and deliverable and the timescale is correct
- SHF013. The site is viable and deliverable but the timescale is likely to be short term rather than medium term
- SHF022. The site is viable and deliverable and the timescale is correct
- FRD011. The site is viable and deliverable but the timescale is likely to be short term rather than medium term
- OSW017. The site is viable and deliverable and the timescale is correct

We have been in constructive discussion with the owners of site but do not have a firm agreement with them. However we understand they are keen to see this site progress and believe it to be viable and deliverable on the identified timescale.

We also have an interest in ELL005 which I think you may have already asked about. However for the avoidance of doubt I can confirm this is viable, deliverable and that we hope to commence development in 2021.

Best regards,

Howard Thorne

Shropshire Homes Limited

From:
Sent: 24 November 2020 12:03
To:
Cc:
Subject: Viability and Deliverability of Site Promotions

Hi Howard,

I note that you are involved in a number of the sites proposed for allocation within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan which was recently subject to consultation, including: PON008, SHR057&SHR177, SHR013, SHR022&SHF023, FRD011 and OSW017. With regard to these sites can you please confirm:

1. That the sites are viable and deliverable, having regard to the policy requirements identified within the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan.

The 'Regulation 18': Pre-Submission Draft Shropshire Local Plan is available to view at:
<https://shropshire.gov.uk/get-involved/reg-18-pre-submission-draft-local-plan-consultation/>

2. Whether the assumptions made with regard to the timescales for the delivery of the proposed site allocations within Appendix 7 of the 'Regulation 18' Pre-Submission Draft of the Shropshire Local Plan are generally considered to be:

- a. Correct;
- b. Too early – delivery is likely to occur later in the Local Plan period; or
- c. Too late – delivery is likely to occur earlier in the Local Plan period.

If you consider assumptions are either too early or too late, please specify when you anticipate delivery occurring.

Could I ask you to respond as soon as possible. If you have already responded to these questions for these sites, I do apologise, however they did not appear to be specifically addressed within your response to the recent consultation on the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan.

Thank you

Kind Regards

Daniel Corden

[For information about Coronavirus click here/image below](#)



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Appendix 13

Matter 24 – Whitchurch Place Plan Area (Policy S18)

Hearing Statement

Response on behalf of

Persimmon Homes (West Midlands) Limited

MATTER 24

Introduction

- 1) Harris Lamb Property Consultancy (HLPC) are instructed by Persimmon Homes (West Midlands) Ltd (**PH**) to prepare a response to the Inspector's issues and questions in relation to Matter 2. PH are promoting land at Whitchurch for residential development, the majority of which currently benefits from a draft allocation in the draft Local Plan, with an additional area of land that is currently not allocated. Our representations and comments focus on the spatial strategy, housing land supply and the suitability of the proposed allocation which we cover in our responses to Matters 2, 3 and 24.

Q1 What is the background to the site allocation? How was it identified and which options were considered?

- 1) No comment

Q2 What is the scale and type/mix of uses proposed?

- 2) The illustrative layout submitted with the PH's representations show the site accommodating 70 dwellings at a density of 41dph. The site is laid out for residential use with associated access, parking, internal roads and public open space. The mix of dwellings is not specified at this time.

Q3 What is the basis for this and is it justified?

- 3) The basis for the proposed uses is in accordance with the draft allocation (WHT014) land at Liverpool Road, Whitchurch which allocates the site for residential development.

Q4 What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 4) Preliminary work has been undertaken to inform a preparation of a planning application in due course although the promoter is waiting for progress to be made on the Local Plan before submitting the planning application to the Council. The decision to submit the planning application and the exact scope and format of the application will also be informed by the outcome of the additional land that PH are promoting adjacent to the draft allocation and whether or not this is ultimately required or proposed for inclusion in an amended Local Plan.

Q5 *What are the benefits that the proposed development would bring?*

- 5) The proposed development would deliver 70 dwellings to Whitchurch in accordance with the draft allocation. The site could deliver a policy compliant level of affordable housing along with areas of open space whilst ensuring a high quality design that would make a positive contribution to the local area.

Q6 *What are the potential adverse impacts of developing the site? How could they be mitigated?*

- 6) Work undertaken to inform a previous planning application at the site confirmed that highways and access issues were considered acceptable and issues relating to drainage were capable of being resolved. Issues were raised in respect of landscape and visual impact but at the time this was largely due to the fact that the site was located outside of the development boundary to Whitchurch. In light of the draft allocation this is no longer the case and as such this concern is no longer relevant. Further concerns were raised in respect of loss of agricultural land although as the site is now allocated for development the Council appeared to have reconciled this loss. A range of ecological surveys have been undertaken that demonstrate that there are no protected species present that would prevent the development of the site.

Q7 *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?*

- 7) The site is located within Flood Zone 1 as shown on the Environment Agency's Flood Risk Mapping. The site is not subject to surface water flooding issues.

Q8 *What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?*

- 8) The site is not subject to significant infrastructure requirements in order to bring it forward for development. Other than constructing a new access along with any consequential amendments to the highway in order to facilitate this the site is relatively infrastructure light. Furthermore, we are not aware of any physical constraints that would prevent the development of the site should there be any requirements for additional infrastructure arising from the development such as school places these could be satisfactorily addressed through the payment of any development contributions associated with the submission of a future planning application.

Q9 *Is the site realistically viable and deliverable?*

- 9) PH confirm that the site is viable and that as a PLC housebuilder the site is deliverable.

Q10 *What is the expected timescale and rate of development and is this realistic?*

- 10) PH would look to bring the site forward within the first 5 years of the plan period. On confirmation of the allocation PH would look to progress a full planning application. Allowing for the subsequent discharge of condition we would anticipate a start on site within 18-24 months of the allocation be confirmed. PH anticipate that the delivery of 70 units thereafter would take between 18-24 months from the start on the site. It is considered that this is a realistic timeframe and that is deliverable.

Q11 Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 11) PH have submitted further representations about the potential to increase the size of the allocation to include additional land that PH control immediately adjacent to the draft allocation. The additional land was optioned by PH following a discussion with the local planning authority who asked whether they were able to 'square off' the draft allocation. Whilst not a matter for consideration as part of this part of the examination should there be a requirement to identify additional land or sites within the Plan area PH would welcome the opportunity to discuss omission site with the Council.

Q12 Are the detailed policy requirements effective, justified and consistent with national policy?

- 12) PH consider that the policy requirements are effective, justified and consistent and support the allocation of the site in the draft Plan.

Appendix 14

Representations to the Shropshire Local Plan Review: Examination Hearings

Relating to SHR054a – Land south of
Sundorne Road, Shrewsbury

Author: AR



Shropshire Homes Limited ('SHL') are writing to the inspector in relation to draft allocation SHR054a – Land south of Sundorne Road, Shrewsbury.

SHL are supportive of this allocation, and can confirm that they are the intended developers of this site following a contractual agreement with the landowners. SHL are confident that the site is suitable, available and deliverable.

This representation responds to Matter 22 within document ID40 Inspectors' Matters, Issues and Questions (MIQs) Stage 2 which was published on 24th July 2024. SHL understands that in the main the questions relating to Matter 22 are directed to the Council. With this in mind, SHL have only sought to make comment where they feel that they can provide additional detail in supplement to the Council.

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

No comment from SHL.

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

The scale and mix of this allocation will be in-line with the emerging plan and appropriate to the area. The development guideline (60 dwellings) is achievable and will result in predominantly 2-storey residential housing of an appropriate density.

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

The proposed sale and mix of development makes efficient use of the site and reflects the character and density of the surrounding area.

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

There is no relevant planning history.

5. What are the benefits that the proposed development would bring? What are the potential adverse impacts of developing the site? How could they be mitigated?

The development will provide much-needed new homes to Shropshire's primary, most populous and most sustainable settlement. This includes a policy compliant level of affordable housing. The site is well-defined and has a limited impact on the landscape. The northern boundary abuts the Shrewsbury club and existing residential development; the eastern boundary comprises a very well established landscaped bund to the A49 (creating both visual and acoustic separation from the road). The southern boundary comprises established planting, the former canal towpath (Shropshire Way) and a small commercial development beyond which is an established woodland. A benefit to the development is that it will also increase surveillance upon the former canal (otherwise known as Shropshire Way).

The western boundary features established hedging, a service road to the commercial development and a second established hedgerow. Beyond this are the playing fields associated with Shrewsbury Sports Village.

There are no significant adverse impacts of developing this site on its locality.

SHL are confident that the development can be achieved in line with the development guidelines for this allocation, which includes a number of benefits including creation of a high quality and well-designed transition from the settlement to the countryside, a new pedestrian route, replacement of any displaced parking from the Shrewsbury Club site and any highway upgrades required.

6. 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?

The site is located within flood zone 1, and there is no known surface water flooding risk. The development will consider ground conditions and design appropriately sized SuDS features in order to ensure that the site does not worsen any flood risk 'downstream'.

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

Access rights from Sundorne Road are reserved along the eastern edge of the Shrewsbury Club car park. There are no infrastructure requirements other than those usually associated with a development of this type.

8. Is the site realistically viable and deliverable?

SHL is confident that a policy compliant scheme on this site will be viable and deliverable.

9. What is the expected timescale and rate of development and is this realistic?

SHL intend to prepare and submit a planning application for this site as soon as the plan is adopted. They expect completion of the site to take between 2-3 years once construction has begun.

10. Is the boundary of the site appropriate? Is there any justification for amending the boundary?

SHL believe that the boundary is appropriate, and well defined, and enclosed (as described in response to question 5). We do not believe there is any justification for amending the boundary.

11. Are the detailed policy requirements effective, justified and consistent with national policy?

SHL believe the policy requirements are effective, justified and consistent with National Policy.

Appendix 15

From:
To:
Cc:
Subject: [CAUTION] RE: Viability and Deliverability email Weston Rhyn WRP001/006
Date: 18 November 2020 09:18:35
Attachments:

** CAUTION
** It has not been possible to verify the sender of this e-mail as the sender's
** e-mail domain does not have a valid SPF record. This means the sender's
** e-mail address may be spoofed and used for SPAM or Malware distribution.
** Treat the e-mail with caution, and if in doubt contact the sender.
** If you need further help please email its.helpdesk@shropshire.gov.uk

Morning Matt

Thanks for the email to which I would respond as follows:

- 1. With regard to this proposed site allocation, can you please confirm that the site is viable and deliverable, having regard to the policy requirements previously identified within the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan.**

The 'Regulation 18': Pre-Submission Draft Shropshire Local Plan is available to view at:
<https://shropshire.gov.uk/get-involved/reg-18-pre-submission-draft-local-plan-consultation/>

I can confirm that:

- The owner of site WRP001 wishes to dispose of the site as quickly as possible. I understand that the owners of site WRP006 are of the same mind.
 - There is a local developer who is in discussion regarding the purchase of the 2 parcels of the land and wishes to bring the site forward as soon as possible.
 - The site is free from constraints and is viable.
- 2. With regard to this proposed site allocation, can you confirm which of the following timescales the total site (i.e. both WRP001 and the east part of WRP006) is likely to be fully delivered:**
 - a. Short-term: 2020/21-2024/25
 - b. Medium-term: 2025/26-2029/30
 - c. Long-term: 2030/31-2034-35
 - d. Long-term: 2035/36-2037-38
 - e. Beyond the Plan period (2038+)

It is anticipated that the application would be submitted following adoption in 2022 with development commencing in 2023/2024, so the development would commence in the 'short term'.

I would anticipate that it would be completed in the 2025/26 to 2029/30 'medium term' period.

I have copied in Clive Roberts for information and as before if there is any further information required feel free to contact Clive or myself.

Thanks

Regards
Nigel Thorns
BSc(Hons), DipTP, MRTPI

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3. Nigel Thorns Planning Consultancy cannot accept any responsibility for any viruses which are transmitted. We therefore recommend you scan all attachments.

From: Matthew Jones

Sent: 17 November 2020 12:29

To: Nigel Thorns

Subject: Viability and Deliverability email Weston Rhyn WRP001/006

Importance: High

Dear Nigel

Following the Agreement which has been made between your client (as owner of site WRP001 in Weston Rhyn) and the owner of the adjacent site (WRP006), I am sending the below to ensure that the site remains viable and deliverable. This request was previously sent in August 2020 to the preferred sites for the Reg-18 stage, however given there has been an amendment we are required to ask the below again. This email will also be sent to Clive Roberts as the agent for the owner of WRP006. Can I please request that this is responded to asap so that I can update our records prior to the Reg-19 Draft being released?

Thank you

Shropshire Local Plan Review - Viability and Deliverability of Proposed Site Allocations

Dear Mr Thorns

Following the conclusion of Shropshire Council's 'Regulation 18' Consultation on the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan, there has been a new 'joint' site promotion at Weston Rhyn. Specifically, it combines all of WRP001 (to the west of Trehowell Lane) and the eastern part of WRP006, which lies adjacent to WRP001.

As it was essential that we ensured that the proposed site allocations within the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan were deliverable, we are required to request this information from you as there is to be a change in a preferred site at Weston Rhyn. Therefore, we are writing to both of the promoters of this site, seeking confirmation from them that the site is deliverable and viable.

I understand that you are acting as the key point of contact for the proposed site allocation WRP001 (west side only) – land west of Trehowell Lane, Weston Rhyn. Following the Agreement

that is now in place between the land owners of WRP006 and WRP001, can you please confirm the following:

1. **With regard to this proposed site allocation, can you please confirm that the site is viable and deliverable, having regard to the policy requirements previously identified within the 'Regulation 18': Pre-Submission Draft Shropshire Local Plan.**

The 'Regulation 18': Pre-Submission Draft Shropshire Local Plan is available to view at:

<https://shropshire.gov.uk/get-involved/reg-18-pre-submission-draft-local-plan-consultation/>

2. **With regard to this proposed site allocation, can you confirm which of the following timescales the total site (i.e. both WRP001 and the east part of WRP006) is likely to be fully delivered:**

- a. Short-term: 2020/21-2024/25
- b. Medium-term: 2025/26-2029/30
- c. Long-term: 2030/31-2034-35
- d. Long-term: 2035/36-2037-38
- e. Beyond the Plan period (2038+)

Given the current timing, could I please ask for you to respond to these questions ASAP.

Thank you

Kind regards

Matt Jones

Appendix 16

From:
To:
Cc:
Subject: RE: Viability and deliverability of the proposed allocations in Shropshire Council ownership
Date: 25 August 2021 12:29:43
Attachments:

Hi Dan,

My apologies for not replying last week following my conversation with Eddie. I can indeed confirm that work continues to bring forward these sites and significant progress has been made following their promotion. The Council as landowner is working very closely with its wholly owned company Cornovii Developments in this respect. The Asset Management Team under the new Property and Development service area is leading the work now following the retirement of Jane Kenyon and Leela Cottey is the manager of the team.

With regard to the sites listed below I can confirm that further to the work undertaken to date that they remain very much viable and deliverable with regard to the policy requirements identified within the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan. We will continue to undertake further diligence work in this respect.

Many thanks

Steve

Steve Law
Head of Property and Development
Property and Development



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Shropshire, SY2 6ND

From: Dan Corden
Sent: 24 August 2021 13:13
To: Steve Law
Cc: Edward West
Subject: Viability and deliverability of the proposed allocations in Shropshire Council ownership
Importance: High

Hi Steve,

I hope you are well. I understand that our request for confirmation of the viability and deliverability of the proposed allocations in Shropshire Council ownership has been directed to

you and that you recently discussed this matter with my manager Edward West.

The five sites owned and promoted by Shropshire Council are:

- SMH038 in St Martins;
- WRP017 in Weston Rhyn;
- BAY050 in Bayston Hill;
- WEM025 in Wem; and
- SHR161 in Shrewsbury (forms part of a wider proposed allocation).

With regard to these sites can you please confirm that they are viable and deliverable, having regard to the policy requirements identified within the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan.

The 'Regulation 19': Pre-Submission Draft Shropshire Local Plan is available to view at: <https://shropshire.gov.uk/get-involved/reg-19-pre-submission-draft-local-plan/>

Just to confirm that at this stage a simple confirmation that the sites are viable and deliverable, having regard to the policy requirements identified within the 'Regulation 19': Pre-Submission Draft Shropshire Local Plan, is sufficient.

Please let me know if you need any further information. Ideally we could do with a response to this query as soon as possible.

Thank you

Kind Regards

Daniel Corden

Planning Policy, Shropshire Council – Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND

Appendix 17

The explanatory text to draft policy SP16.2 provides further narrative which has informed preparatory work undertaken on behalf of the landowner to demonstrate that the site is deliverable. In particular, paragraph 5.230 states:-

“Baschurch is a large village to the north of Shrewsbury, which benefits from a good range of services and facilities. Over recent years the village has experienced relatively high levels of growth, partly through planned development, but also as a result of speculative applications granted approval in an effort to boost housing supply. The local housing requirement and the allocations identified to deliver this, reflect this situation and the need to utilise existing opportunities, but also to ensure a balance of development across the village.”

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

The land is currently used for agriculture. It is an arable field adjacent/adjoining existing residential development. There are no current planning applications on the site.

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

The development would bring housing and policy compliant affordable housing to the community as well as being policy compliant in all other respects.

Residential development in Baschurch will help to encourage Shropshire Council to look positively at opportunities for Shropshire to utilise the railways within the county. Baschurch is the prime location in which this can realistically be achieved. The village lies on a railway line and despite the closure of the station many decades ago, the potential remains to open a station at Baschurch. The Council's Sustainability Appraisal notes that, *“A greater emphasis on urban centres provides the best opportunity of the three options to exploit existing transport infrastructure and improve access to public transport in the medium to long term.”* Baschurch already has good public transport in terms of its bus services, and this could be further improved with the re-opening of the railway station. The Parish Council has commissioned a feasibility study looking into this.

Baschurch is a location where the market has shown strong interest and where rural development can be focused on a location with a good range of services and facilities including primary, secondary and tertiary education (Adcote School for Girls and Walford Agricultural and Sports College), and the potential to deliver road and rail infrastructure improvements.

Recent growth in Baschurch is linked to the provision of a mini-supermarket and provision for a new doctors' surgery. There is potential for the railway station to be re-opened over the plan period too. The development will help the village to have the 'critical mass' necessary to retain its existing services and attract new facilities in the period to 2036.

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

This is an edge of settlement location and so the landscape impacts of this will need to be considered with care. A Landscape and Visual Impact Assessment in support of any subsequent planning application may help inform the landscape design and any mitigation required.

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?

The proposed allocation is within Flood Zone 1 and is therefore at the lowest risk of flooding and sequentially the site is therefore acceptable for development.

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

The development will be accessed via an existing development approved under reference 14/01123/OUT. No new access is proposed off Milford Road. Highway junction improvements may be required on The Shrewsbury Road junction to accommodate the increase in traffic.

9. Is the site realistically viable and deliverable?

Yes. This is a greenfield site, with an existing access available via the adjacent development to the east. There is a developer on board and deliverability is extremely likely to happen within the first 5 years of the plan period.

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

The site is immediately available and has a developer on board. It can be delivered early within the plan period.

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

The site boundary is acceptable.

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

Yes

Appendix 18

- Policy DP1: Residential Mix sets a default housing mix of 25% 2 bed or smaller and 25% 3 bed or smaller. In combination with the proposed low housing guideline for this site, it limits the amount of residential floorspace that can be delivered, compounding the low density to an even more inefficient use of a sustainably located site.
- Paragraph 122 of the National Planning Policy Framework which requires that, "Planning policies and decisions should support development that makes efficient use of land".

A scheme that meets policies SP1, SP3, SP5 and DP1 will necessitate a higher density. We therefore suggest that the site's guideline figure is increased to 30 dwellings. This figure reflects the indicative capacity of 31 dwellings for site MIN018 on page 35 of the Council's Minsterley Site Assessments report.

The proposed density is lower than the adjoining Linden Fields development which delivered 16 dwellings on 0.51 hectares of land, equivalent to a density of 31.4 dwellings per hectare.

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

This site is accessible off the A488 (with appropriate speed restrictions/traffic calming measures) and relatively well located in relation to the existing built form of the village. Flood constraints and surface water management would need to be taken into account in the design of any development.

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

The land is currently used for agriculture. It is an arable field adjacent/adjoining existing residential development to the south west. There are no current planning application on the site.

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

The development would bring housing and policy compliant affordable housing to the community as well as being policy compliant in all other respects. Allocation of this site can also benefit adjoining land and alleviate existing flood issues that originate on the A488, by helping channel surface water into the Little Minsterley Brook. The site is not part of the problem, but it can be part of the solution.

We consider that site MIN018 offers Minsterley the opportunity for:

- a crossing point of the A488 for pedestrians using the footpath/cycle link to Pontesbury;
- a site that is well located for both Minsterley's facilities and Pontesbury's additional facilities including the secondary school;
- slowing traffic entering the village by moving the 30mph speed limit extent and providing visual cues that encourage drivers to slow down on approach to the village;
- an attractive entrance to the village that helps meet local needs for a range of housing;
- a site that is relatively unobtrusive in the landscape and that will not affect the Area of Outstanding Natural Beauty to the south of Minsterley;
- better management of surface water draining down the A488 into Little Minsterley brook.
- To reduce surface water on the A488 and alleviate downstream flood risk at Little Minsterley, provide a 1 metre wide grip in the verge of the A488 to direct water from the road directly to the ditch course that runs along the north-east boundary of site MIN018;
- Improve the existing highway drain running from the A488 through site MIN018 to Little Minsterley Brook;
- Improve drainage at Linden Fields by directing surface water flows from the Linden Fields development to the Little Minsterley Brook through channels created for this

purpose in the public open space, designed as part of the development of site MIN018.

Appropriate access arrangements will be required. The 30mph zone should be extended to reflect site extent, together with any necessary traffic calming. To improve accessibility to services and facilities a footway should be provided along the site's road frontage, to form a continuous footway link with that existing to the south west and a crossing facility provided to link to the footpath/cycleway on the opposite side of the A488.

The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site. Development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere. Design and layout should minimise noise impact from adjacent road. Mature trees on the site should be retained and the environmental network to western boundary buffered. Relevant supporting studies should be undertaken particularly ecology, tree and hedgerow surveys, flood risk and drainage with their recommendations clearly reflected in the proposed development scheme

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

In landscape terms, the southern side of Minsterley is visually sensitive, with long distance rolling views of the Shropshire Hills Area of Outstanding Natural Beauty to the south.

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?

The site is suitable for development with 94% of site MIN018 in flood zone 1 (low risk of flooding).

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

The preferred allocation MIN018 does not affect any public rights of way, making it more suitable than alternative sites around Minsterley. Indeed, MIN018 will provide new pedestrian routes along its frontage, to link with the pedestrian footway between Minsterley and Pontesbury along the A488.

9. Is the site realistically viable and deliverable?

Yes, the site is a greenfield site with some drainage constraints in places. The site is deliverable, but a higher density of development should be provided on the site to make better use of the available land.

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

The site is immediately available and in a sustainable location in a Community Hub settlement. There are a number of developers interested in purchasing the site, but discussions remain confidential until the allocation has been secured. It is anticipated that delivery of the site would be early within the plan period.

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

Yes

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

Yes

Appendix 19

**Shropshire Local Plan Review: Site reference – BIT022 Bicton (A0352) on behalf of HP Price & Sons Mr Barry Price.
Residential development for around 15 dwellings on land East of Villa Farm, Bicton.**

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

The proposed housing for Bicton (2016-2038) is set out in draft policy S16.2. Community Hubs: Shrewsbury Place Plan Area

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

The site extends to 1.8 hectares and is the only proposed allocated site for Bicton. There is a windfall development of 12 for the settlement and yet the housing guideline for the site is only 15 dwellings. The site could accommodate more than double the housing guideline, and more land is available bordering the proposed allocation that would make a logical extension. At the current target of only 15 dwellings, this would result in a density of development of only 8.33 dwellings to a hectare. The site could accommodate a range and mixture of dwelling sizes to meet the needs of the area, rather than large executive size housing which would be likely with a housing guideline figure of only 15 dwelling for the whole allocation.

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

Bicton is a modest sized village to the north west of Shrewsbury on the B4380. Whilst the village benefits from a range of services and facilities, the growth proposal for the area has taken account of its limited scale as well as levels of past housing delivery. The retention of local village character and the maintenance of a clear distinction from the eastern edge of Shrewsbury are key local priorities and have been reflected in the allocation on land east of Villa Farm.

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

The land is currently used for agriculture. It is an arable field adjacent/adjoining existing residential development to the west. There are no current planning applications on the site.

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

The development would bring housing and policy compliant affordable housing to the community as well as being policy compliant in all other respects. It would utilise an existing access onto the highway.

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

The proposed density of development is low and should be increased to make use of the land available and provide a better range and mix of house types and tenure.

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?

The proposed allocation is within Flood Zone 1 and is therefore at the lowest risk of flooding and sequentially the site is therefore acceptable for development.

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

An appropriate access from the B4380 and any necessary improvements to the local highway network, including an extension of the 30mph zone other and traffic calming measures will be delivered. Existing trees, hedgerows and priority habitats will be retained and enhanced. The development will respect heritage assets within the wider area. Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from the B4380. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of

the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.

9. Is the site realistically viable and deliverable?

Yes, the site is a greenfield site with minimal constraints. The site is deliverable, but a higher density of development should be provided on the site to make better use of the available land. Given that the housing allocation for Bicton is proposed to be 30, this site is large enough to accommodate all of that allocation and more.

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

The site is immediately available and in a sustainable location located close to the market town of Shrewsbury. There are a number of developers interested in purchasing the site, but discussions remain confidential until the allocation has been secured. It is anticipated that delivery of the site would be early within the plan period.

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

The residential development guideline for Bicton states 30 dwellings in total, with this site BIN022 providing 15 of those units. The density of development is extremely low, the site is capable of accommodating the whole housing guideline for Bicton, and more land is available should the housing guideline figure for the settlement be increased.

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

Yes