

Shropshire Local Plan Review

Apley Estate & Stanmore Properties, Stanmore Garden Community

Representations to the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan

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1 Introduction

1.1 Background to Representations

- 1.1.1 These representations have been prepared on behalf of the Stanmore Consortium (the “Consortium”). JLL and Stansgate Planning are instructed to make these representations on its behalf in response to the Regulation 19 Consultation of the Shropshire Local Plan Review.
- 1.1.2 These representations support the case for the allocation of land in the ownership of the Consortium immediately to the east of Bridgnorth, adjacent to Stanmore Business Park, (formerly Stanmore Industrial Estate); the land is being proposed for the Stanmore Garden Community the majority of which lies in the ownership of the Apley Estate and Stanmore Properties.
- 1.1.3 Stanmore Garden Community presents an opportunity to deliver a new, genuine garden community at Stanmore. It is a proposal which has been adapted taking in the views of local people and will incorporate great design with zero net carbon objectives, affordability, significant amounts of green space, long term stewardship & services and facilities that the community wants delivered early in the development. It is the only genuinely deliverable site for Bridgnorth.
- 1.1.4 The information in this document underpins the Consortium’s representations to the Regulation 19 Local Plan now under consideration.

1.2 Purpose of Regulation 19

- 1.2.1 The Procedure Guide for Local Plan Examinations published by the Planning Inspectorate states that¹:
- “The LPA should rigorously assess the plan before it is published under Regulation 19 to ensure that, in their view, it is sound and meets all the necessary legal requirements. In particular, they should ensure that it takes full account of all relevant policies in the NPPF and relevant guidance in the PPG. The plan should identify all the matters which need to be planned for, and provide policies to address them, paying careful attention to deliverability and viability”*
- 1.2.2 The plan that is published for consultation at Regulation 19 stage should be the plan that the LPA intends to submit to the Planning Inspectorate for examination². Accordingly, the purpose of the Regulation 19 consultation is to allow interested parties to make representations on the potential “soundness” of the Plan.
- 1.2.3 In this regard, Paragraph 35 of the NPPF sets out the four key tests of “soundness”, these are that a plan must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

¹ Paragraph 1.1

² Regulation 19(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2 The Stanmore Site

2.1 Background to the Stanmore Garden Community Proposal

- 2.1.1 In October 2015 the Inspector considering the Site Allocations Plan “SAMDev” stated that the eastern side of Bridgnorth is tightly constrained by the Green Belt, which she considered limits the growth potential of settlements in east Shropshire. The Inspector acknowledged that there were limited opportunities for new development outwith the Green Belt including to the west of Bridgnorth and recommended a modification to the SAMDev which introduced a commitment to a detailed Green Belt review as part of an early review of the Local Plan
- 2.1.2 Shropshire Council were instrumental in identifying and approaching the Consortium in respect of their land holding at Stanmore, which includes the area immediately to the east of Bridgnorth with a view to proposals for a garden community to deliver the housing and employment needs of the Bridgnorth area. The Council brought key parties together to introduce the concept to be promoted through the Local Plan Review.
- 2.1.3 It was against the context of the Inspector’s comments on the SAMDev that the Council considered that the Stanmore site should be the location for a garden community focusing on the existing built development and recreational use. The Council through the earlier stages of the Local Plan Review supported the development of the Consortium’s proposals at Stanmore; this evolved through:-
- Issues and Strategic Options Consultation - early 2017
 - Preferred Scale and Distribution of Development Consultation (late 2017); and
 - Preferred Sites (late 2018/early 2019).
- 2.1.4 Proposals for the Stanmore site were developed during 2018 when it became clear that two of the landowners, Apley Estate and Stanmore Properties, shared a vision to provide a new garden settlement at Stanmore. The concept and precise location of a garden community therefore evolved in consultation with the Council, using a combination of available landownership, with the most suitable areas of land for development.
- 2.1.5 Throughout 2018 regular meetings were held, led by the Council. In November 2018 the Shropshire Local Plan Review: Consultation on Preferred Sites was published with a masterplanned mixed use garden settlement at Stanmore as a Preferred Site.
- 2.1.6 As the proposal evolved and discussions and consultation with stakeholders took place, it became apparent that the country park was regarded as a valued local asset and concern about the loss of any part of the country park was a prominent issue causing significant concern and objection. The matter was addressed by amendment to the proposals to exclude the country park and instead refer to ways in which it could be enhanced.
- 2.1.7 Shropshire Council continued to lead and support the proposal for a new garden community on the Stanmore site as it evolved during 2019. As part of this the Council requested more detailed technical studies and masterplanning which were presented to stakeholders and members of the public at three public exhibitions.
- 2.1.8 The Consortium proposals were worked up and were presented in “A Vision for Stanmore Garden Community” March 2020. The proposal was designed using Garden Village principles, the first part of which would be commenced in the next five years and be completed by 2038.

- 2.1.9 Beyond the Local Plan period of 2038, land was to be safeguarded to allow the proposed Garden Community to expand to a total of 1,500 new homes and a further 14ha of employment land.
- 2.1.10 In April 2020 Shropshire Council unexpectedly and fundamentally changed its position on the Stanmore Garden Community proposal. The Council's Local Plan's Team sought to support an alternative proposal on land which had not previously been promoted through the Local Plan process and which was outside of the Green Belt. The Officers considered that the alternative proposal, Tasley Garden Village, promoted by Taylor Wimpey, was able to offer a comparable garden village but outside of the defined Green Belt.
- 2.1.11 Furthermore, it should be recognised that it was equally open to the Council to approach the landowners at Tasley when plan preparation began in the same way they did at Stanmore. The given reason they did not, was down to the opportunity the location at Stanmore offered, to consolidate existing employment and housing with inward investment supporting growth, a new community, services and facilities and expressed reservations about designating land at Tasley which was separated from the town by the by-pass. There has been no change in circumstances in terms of harm to the Green Belt since the Council made a draft allocation and in fact, the reduction in land area proposed by the Consortium at Regulation 18 stage in September 2020, reduces the level of harm from the position the Council were happy to support.
- 2.1.12 It is against this background that these representations seek to demonstrate that there remains (as the Council has previously recognised and supported) a strong planning case to justify the development of a Garden Community at Stanmore and its inclusion in the Local Plan. As part of this planning case there exist exceptional circumstances to justify removal of the site from the green belt. By contrast whilst the land at Tasley is outwith of the green belt it is neither suitable, deliverable nor available ; on this basis the Site Allocation Tasley Garden Village, Bridgnorth (BRD030) is unsound.

2.2 Suitability of Site

- 2.2.1 The technical evidence addresses the constraints and opportunities to confirm the suitability of the site.

2.3 Availability and Risks to the Deliverability of the Sites

- 2.3.1 Two landowners control the majority of the land needed to deliver the Stanmore garden community and a third owns a minor area to the east of the Business Park. The two active parties, Apley Estate and Stanmore Properties intend to deliver the proposals themselves.
- 2.3.2 It is an established fact that Shropshire needs more housing, and that Bridgnorth and its surrounding area also requires additional homes, especially affordable homes, particularly for younger people. Such housing is required due to the acknowledged demographic changes in Shropshire which has seen a significant increase in the ageing population compared to the rest of the region and the UK. Failure to provide housing could potentially drive both town and County into economic decline, as the economically active, particularly the younger generation, leave the area to find jobs and businesses look elsewhere because of the lack of suitable housing to support their staff.
- 2.3.3 In the face of increased competition from nearby authorities, Shropshire is already under economic threat. This is the result of successful campaigns in Telford and the Black Country authorities to attract new businesses through various, well-resourced economic generation bodies. These authorities have effectively targeted long established companies based in neighbouring counties persuading them of the benefits with modern buildings, better communications, more choice, greater opportunity and a better lifestyle for those of working age.

- 2.3.4 In order to rebalance an ageing demographic structure, it is incumbent on the County to ensure that it can provide houses for those wanting to live in Shropshire and employment opportunities for its residents through their working life. But that won't be enough. The fight for occupiers is fierce and Shropshire must provide modern facilities to retain and draw in employers making the County sufficiently attractive to counter the incentivised approaches being made by neighbouring areas.
- 2.3.5 At Bridgnorth, the County has a rare opportunity to retain major regional employers, working with them to expand and develop a hub of new technology industries in modern buildings alongside them; it can provide housing for all ages and, most importantly, affordable housing in the immediate vicinity of good, well-paid job opportunities. The latter supporting the net zero carbon targets adopted by the County by greatly reducing travel to work distances and the recorded high level of in-commuting - and making cycling or walking to work a practical alternative.
- 2.3.6 The employment market in the area is dominated regionally by Telford and locally by Stanmore Business Park on the east of Bridgnorth. This therefore puts the Stanmore Garden community in the optimum sustainable location given the adjacency to Stanmore Business Park. Specific market advice has been sought by the Consortium (Appendix F of the Reg 18 Representations) from local commercial property agent, Andrew Dixon; he concludes that the land allocated for employment at Tasley is not a suitable industrial location due to the site being on a secondary route with limited transport links. The Agent's view is that a development to the west of Bridgnorth (which is where Tasley is located) is not considered to be viable and therefore would require significant cross subsidy from the residential development. No evidence has been presented by the promoters of the Tasley site or the Council to show how the employment, which is considered to be an important element of the Site Allocation BRD030 and a key part of the Garden Village principles) would be delivered.
- 2.3.7 As set out in Government advice in the National Planning Practice Guidance, in relation to viability, understanding the viability of a scheme is critical to the overall assessment of deliverability. The Consortium consider that without a clear demonstration as to how the employment can be viably delivered to meet the Site Allocation requirements, the proposal cannot be justified or demonstrated to be deliverable and therefore is unsound.

Location

- 2.3.8 The County is faced with competing proposals at Tasley and at Stanmore to the west and east of Bridgnorth respectively. Both are areas of open countryside with Tasley adjacent to the open spaces and rolling hills of the Shropshire Hills Area of Outstanding Natural Beauty, and principally accessed through the town. Stanmore is arable farmland and sits closer to the West Midlands conurbation, next to the former RAF base. This is now a highly successful business park, home to Grainger & Worrall Ltd, a world-leading engineering business employing about 700 people and other principal non-agricultural companies in the area. Tasley has no industry or major employment nearby, albeit land has been allocated for employment uses adjacent to the proposed Livestock Market relocation site.
- 2.3.9 Without easy access to the Black Country and the wider West Midlands, where the customers of many of the local commercial companies are based, there is quantifiable risk that the land allocated for employment use, will fail to be developed because it is on the wrong side of Bridgnorth.
- 2.3.10 In relation to employment, the Shropshire Employment Land Review published in 2019, concludes, having regard to the growth aspirations of the County and the latent market demand in key locations, there is potential to bring forward strategic and local employment sites to meet market demand and to diversify the economy by attracting higher value sectors that drives economic productivity and retain talent in the County.

- 2.3.11 Bridgnorth is identified as a key location for significant local employment opportunities, particularly new development in existing proven employment areas. The Employment Land Review specifically states that there is an opportunity to demand for future provision of B-Class employment in Bridgnorth
- 2.3.12 The Shropshire Strategic Employment Areas and Sites Study, produced in 2014 identified four sub Regional sites which significantly contribute to Shropshire employment land supply for B Class uses. Stanmore Industrial Estate is identified as a sub-regional site which is one of the County's prestige Employment Areas, capable of competing for investment from across Shropshire and West Midlands; and capable of attracting inward investment.
- 2.3.13 The Shropshire Economic Development Needs Assessment (EDNA) published by the Council in December 2020 provides the economic evidence to help underpin the emerging Local Plan. It also recognises Stanmore Industrial Estate as being of sub-regional significance.
- 2.3.14 The EDNA identifies that much of the industrial premises across the County are dated and in need of refurbishment in order to meet the requirements of modern occupiers and recognises that there are cases where occupiers have been lost due to the lack of available high quality industrial stock.
- 2.3.15 The EDNA recognises that there is a shortfall of good quality space available for businesses looking to expand their footprint. The EDNA identifies the need to develop high quality space in the right areas to allow for sustainable expansion and inward investment. Such an approach should be adopted to counter the competing schemes in Telford and the Black Country authorities absorbing the demand that cannot be catered for within the Shropshire market.
- 2.3.16 In considering the importance of expanding Stanmore Business Park, the EDNA concludes that demand at a regional and national level will be driven by a clustering effect driven by Key large companies. Ensuring "Oven Ready" land for employment development coming to the market, particularly for light industrial and general industry is vital to meet the latent demand in the market; not satisfying this demand in the right location, will result in those seeking employment premises to relocate outside the County. Allocating land for employment purposes at Tasley delivers the opposite of the clustering that is recommended, and the only beneficiaries will be Telford and the Black Country.
- 2.3.17 The EDNA identifies the need to promote growth in high value employment roles/jobs that require a skilled workforce in Shropshire, that meets the aspirations of resident workers reducing the need to commute to and from Telford, the Black County and beyond.
- 2.3.18 Locating growth or 'Clustering' businesses around existing employment sites is the commercially preferred location. In Bridgnorth's case this means around Stanmore Business Park, this should be the clear focus for a new quarter of the town where new jobs will be created and is the commercially preferred location. Stanmore is far better located to reach major areas of commerce and industry in the conurbation and other existing employment areas around Bridgnorth, than alternative sites to the west of the river Severn. This is demonstrated in the survey responses received and reported in MacMullen Associates report (submitted to the Council March 2020 in the Vision document Appendix A2).
- 2.3.19 It follows that if the wrong location is identified, it is at risk of not being delivered and the objectives of the Local Plan will not be met. Tasley is the wrong location.

Ownership and Viability- Tasley

- 2.3.20 The proposal at Tasley relates to land in multiple ownerships, none of which is owned by the proposed developer Taylor Wimpey, and all of which will require formal legal arrangements, such as option and equalisation agreements, to be agreed with the owners if the number of houses Bridgnorth needs are to be delivered. At present, Land Registry records show that only one option agreement has been completed on land which could deliver no more than between 128 and 160 houses when based upon a development which achieves garden village principles ie applying a density of between 30 and 35 dwellings per hectare. It would not deliver or contribute to the wider social benefits or local services required of a Garden Village as there is no ability for comprehensive site-wide delivery.
- 2.3.21 The need to enter into formal arrangements for the purchase of land will impact the viability of a housing scheme, as they will dictate the price that the developer must pay for the land. Higher prices will need to be offset in some way whether that is by reducing the spend on providing promised amenities or the extent of planning obligations which will be secured through section 106 agreements. Where such savings are not made then this would inevitably lead to higher house prices (which would clearly impact on young first-time buyers or low income families). There is also a further risk that if the profit margin for the developer decreases below an acceptable level, later phases will be cancelled as a result of insufficient margin being achieved or the developer will reduce its offer of Affordable Housing on the grounds of 'viability'. It is a commercial reality that Plc companies are principally focussed on their share price which in turn is generally governed by their profit. Understandably, they take a commercial, not philanthropic approach to all their business decisions.
- 2.3.22 All of this translates into risk; a risk that the housing Bridgnorth needs will fall substantially short of the required numbers and that ancillary facilities promised and necessary planning obligations, (e.g. meeting Affordable Housing policy targets) will not be delivered in full, if at all.
- 2.3.23 The issue of land ownership is an important consideration as in the non-delivery of Birmingham City Council's allocation at Langley Sustainable Urban Extension (SUE). The site was allocated for the development of 5,000 dwellings during the period of the Birmingham Development Plan 2031 which was adopted in January 2017. The Council's trajectory in April 2017 predicted delivery of 655 dwellings between 2017 and 2022, however, four years on an outline planning application is yet to be submitted. A Supplementary Planning Document (SPD) for Langley SUE was produced in April 2019 which refers to the site "being owned by several landowners and developers, the majority of which have formed Langley Sutton Coldfield Consortium". The Consortium website has not been updated since 2019 and the development framework to coordinate and guide development required by the SPD is not evident as having yet been produced.
- 2.3.24 The SPD at Langley refers to how a "comprehensive site-wide delivery and infrastructure phasing plan will need to accompany the development. As the site is in multiple ownerships, the strategy will need to put in place an approach which shows how the costs of development will be funded and delivered. It will need to address how these costs (including ongoing maintenance) and land required for infrastructure will be split proportionally to ensure they are equitable between all current and future landowners and developers on site. Importantly the plan will also need to demonstrate how infrastructure will be brought forward to support the creation and growing residential communities, particularly in the early phases of development."
- 2.3.25 As there were known to be multiple ownerships and no overall control at Langley, the approach to delivery had failed and no agreement has been reached between the landowners/developers. The result was non-delivery and in 2019 the Council advised the earliest date to start on site would be 2023/24 and building expected would continue beyond the plan period leaving a shortfall of about 3,000 houses in the plan period. As there has still been no application, this trajectory has slipped again.

- 2.3.26 The experience at Langley clearly illustrates the risks of delivery failing where multiple ownerships are involved. Bridgnorth would, if the Tasley site is allocated without landowner agreements, be at risk of no housing delivery during the Plan period.
- 2.3.27 It is also relevant to have regard to the Uttlesford Local Plan which included proposals for Easton Park Garden Community; North Uttlesford and West of Braintree, which would have been a cross-border allocation fitting in with the North Essex Garden Communities.
- 2.3.28 In a letter dated 10 January 2020 the Inspectors outlined fundamental concerns with the Garden Community allocations. They advised the plan be withdrawn, which the Council has subsequently done and is preparing a new one before its 2023 deadline.
- 2.3.29 In their letter the Inspectors summarised their main concerns which included:-
- The lack of clear mechanisms to ensure the Garden Community Principles will be met;
 - The lack of certainty about the delivery of employment uses undermines the potential for the Garden Communities to be sustainable places;
 - The costs, viability and deliverability of the transport infrastructure are uncertain and any benefits would be realised too late to help ensure the Garden Communities would be sustainable places;
 - Realistic infrastructure costs have not been established meaning it is uncertain whether the Garden Communities will be viable and developable;
 - The Garden Community was flawed in terms of landscape and heritage impacts and the potential for the highway improvements and public transport infrastructure are uncertain, undermining the potential for this Garden Community to be a sustainable place;
 - The Garden Community was considered to be flawed in terms of heritage impacts, the potential for highway improvements were uncertain pending further investigations
 - Deletion of the Garden Community from the Local Plan was also recommended because of the barriers to its development and inability to meet the Garden Community Principles
- 2.3.30 It is considered that very similar circumstances exist at Tasley, to those found in the Uttlesford Local Plan and the Langley SUE, where there is no evidence presented as to the viability and no agreement between parties that means there is a risk of non-delivery. Such risk would not exist if Stanmore were allocated on the basis that there is agreement between the landowners.

Ownership and Viability– Stanmore

- 2.3.31 At Stanmore, one landowner owns the land needed to deliver the housing element of the garden community, a second owner owns the land for majority of the employment proposals. The two active parties, Apley Estate and Stanmore Properties are actively working together with full agreement to promote & deliver this exciting new community including mixed uses and infrastructure. Apley and Stanmore intend to deliver the proposals themselves.

- 2.3.32 The land comprising the Stanmore site is available immediately, there are no legal or ownership impediments to development. The two landowners control all of the land needed to deliver the proposed Garden Community; with Apley owning all the land required for the proposed residential, some of the employment and the infrastructure, green space & mixed use land; whilst Stanmore Properties own or control the remaining employment land. All the land necessary for delivery (including all that needed for 'off-site' works) is included in the agreement.
- 2.3.33 The proposed housing land has had one owner only for over 100 years. It is not therefore 'subject to successful negotiation' or 'conditional acquisition'. Whereas, there has been no evidence submitted by the promoters of Tasley to demonstrate control of the land and deliverability. At a stroke the Council could remove the risks of agreements not being agreed with the landowners at Tasley and have the certainty at Stanmore. Certainty that the required housing will be provided in phases to meet the needs of the people of Bridgnorth rather than those of the Stock Market. All of the Bridgnorth's projected housing through to 2038 (and beyond) could be delivered if required, without risk.
- 2.3.34 At Stanmore, whilst the development needs to be profitable, this is not influenced by the needs to deliver financial results to the Stock Exchange; the Apley Estate has operated as a 'legacy landowner' for over 10 years and has a record of investing profits back into the wider community in Bridgnorth. The Consortium does not have to go out into the marketplace to acquire land at current day commercial prices. The land is already owned and valued at agricultural use which is substantially less than the price the developer at Tasley will have to pay to agree the required option agreements. This makes the Stanmore scheme immediately more viable. Furthermore, there are potential opportunities to reuse buildings for some of the proposed additional facilities, The required housing and community facilities for the future of Bridgnorth can and will be delivered at Stanmore.
- 2.3.35 In considering the viability, it is relevant to have regard to the recently considered North Essex Joint Local Plan 2013 – 2033. The emerging local plan put forward by the North Essex Garden Community Limited (made up of Colchester, Braintree, Tendring and Essex County councils) featured three Garden Communities (GCs) amounting to 43,000 homes in total at sites on the Tendring/Colchester district borders, West of Braintree and on the Braintree/Colchester district borders. In May 2020 the Inspector wrote to advise that he thought that the Local Plan as submitted was unsound but could be made sound if two of the undeliverable Garden Communities were dropped from the plan. The Inspector said: "the viability appraisal shows that, with an appropriate 40% contingency allowance on transport and utilities infrastructure, the proposed Colchester / Braintree Borders GC would not achieve a viable land price, and that the proposed West of Braintree GC is below, or at best is at the very margin of, financial viability, contrary to advice in the PPG. On this basis, neither GC is deliverable."
- 2.3.36 As a result of the viability issues, the North Essex Garden Community Limited was wound up in August 2020 as the plan continues forward with the Tendring/Colchester site, the other two have been removed. On the basis of this decision it is clear that the viability of proposals needs to be demonstrated, the lack of evidence provided by the promoters of Tasley clearly calls into question its viability.

Livestock Market and intended Poultry Production Unit

- 2.3.37 Tasley is home to Bridgnorth and District's livestock market and as part of the SAMDev will be relocated to a new location to the south of the A458 in Tasley (Allocation ELR011b), to enable redevelopment of a mixed use development including 500 new homes (allocation BRID001/BRID020a).
- 2.3.38 The proposed Taylor Wimpey housing, which is currently supported by the Council, will wrap around the new relocated market. This raises the issue of whether people will want to have a house next to a cattle market

with the associated noise and odours. It was the fact that housing and livestock do not mix that has led to the relocation of the market in the first place. Being downwind of a livestock market is not pleasant at any time but especially so in the heat of the summer.

- 2.3.39 Given the strategic importance in delivering Bridgnorth housing land, the Council's support for a site that wraps around the relocated cattle market is commercially very dangerous. In addition, given the importance of the livestock market to the economy and reputation of Bridgnorth, constraints caused by close proximity of incompatible uses may put its future success at risk.
- 2.3.40 Whilst highways might be adapted to minimise congestion, subject of course to cost, the noise and odour generated by livestock cannot be easily controlled. Whilst it might be possible to mitigate the impact on the highway network, mitigation in relation to air quality and noise will be difficult due to the proximity of the housing, the scale of livestock operation and unsociable hours it will function. For the same reasons that the market relocation is proposed from the existing site, there will be an actual and perceived impact arising from the operation which will have an impact on the delivery of the housing proposed.
- 2.3.41 Additionally and equally importantly there is the matter of the intended Poultry production unit, often referred to as a chicken farm. The draft local plan says "before occupation of the first dwelling on the site, any poultry units operating on the site or land with the wider site promotion identified on the Policies Map as a Potential Future Direction of Growth will cease operation". This cannot possibly be enforceable – because the Potential Future Direction of Growth is not an area that is subject to any designation except some vague future hope. This could not be addressed with a S106 agreement equally a Grampian Condition wouldn't work either.
- 2.3.42 It stretches credibility that any house buyer would willingly want to live in immediate proximity of a livestock market and a chicken farm. It also has to be asked whether there is a much better offer on the table without these issues.

Mitigation

- 2.3.43 Mitigation is the action of reducing the severity, seriousness or painfulness of something. In the evidence base produced by officers to support the allocation at Tasley, it is clear that mitigation is required for almost every aspect of the Tasley option, if not clearly stated it is strongly implied. For example 'Tree planting to provide appropriate and substantial buffering', translates as *planting will have to be undertaken to mitigate unacceptable aspects of the development*. However there seems to be a lack of understanding of how long it takes for 'native' trees to grow to the size where it provides buffering. Use of design and building materials to manage noise from the A458, means that it is already acknowledged the noise from this major road is a problem requiring mitigating. Design and building materials will also be used to manage any noise dust or odour from the relocated livestock market, again this is mitigation of factors that adversely impact the proposal. The Tasley site adjoins an operational quarry and land designated for further mineral extraction, a further source of dust & noise. Mitigating highway challenges, mitigating site access issues, mitigating ecological, heritage and landscape impacts, mitigating flood risk, mitigating the smell and noise of the cattle market, mitigating dust and noise from quarries. In our opinion, the level of mitigation only reinforces the unsuitability of a site. It also increases significantly the cost of developing the site, which has a direct impact on the proposal's financial viability. The amount of mitigation required at Tasley is exceptional and this further places at risk the delivery of the Tasley proposals or that insufficient mitigation will be provided against the adverse impacts.
- 2.3.44 At Stanmore, the level of mitigation required is not remotely on the same scale.

Targeting Net Zero

- 2.3.45 In declaring a climate emergency, Shropshire Council has recognised that one of the most important issues the world faces at the moment, is that of global warming. One of the principal contributing factors that can be easily influenced is travel by car, and most car journeys are a daily commute to work or to a shop.
- 2.3.46 Directing development to the most sustainable location will be an important consideration, it should be recognised that in the case of Bridgnorth, as commuting is generally to the east of the settlement to employment locations such as Stanmore Business Park, the conurbations to the east and Telford to the north; a development on the east side of the Bridgnorth will significantly reduce the miles travelled by car compared to development on the south or west. Furthermore, by locating jobs next to housing, the need to travel is reduced as walking and cycling become realistic alternatives.
- 2.3.47 In the case of Bridgnorth, it is estimated by allocating development at Tasley Garden Village rather than Stanmore Garden Community, this will result in **an additional 2 million miles of commuting a year.** (based upon the promoters of Tasley views that 75% of the peak time (i.e. workers) traffic generated would travel mainly on the single route east, across the River Severn)
- 2.3.48 In reality, the Council can use this opportunity to make a significant step to achieving its targets by supporting the Stanmore proposals as the preferred option. The Stanmore proposals will reduce the need for workers to drive to work, will reduce congestion, and will reduce travel distances even to the wider West Midlands. Crucially it will also provide the opportunity for people to walk or cycle to work. In turn improving their health and wellbeing and delivering a development that meets the environmental aspirations of the local population with the potential to significantly improve the biodiversity of the existing Country Park.

Green Belt

- 2.3.49 The Stanmore land is on the extreme western edge of the West Midlands Conurbation Green Belt. The Green Belt designation is a planning policy intended to prevent the westward sprawl of the West Midlands conurbation. It has done that very successfully as the conurbation is 12 miles away but the importance of this protection is not to be underestimated given the revitalised industries in this conurbation. It was acknowledged by the Report of the Examination of the SAMDev in 2015 that Bridgnorth is the second largest of 5 market towns in Shropshire and is located on the western edge of the West Midland conurbation. It therefore offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. It also acknowledged that the eastern side of Bridgnorth is tightly constrained by the West Midlands Green Belt.
- 2.3.50 The Green Belt policy is not designed to suppress the economies and genuine needs of settlements in and around it. The size and location of Bridgnorth makes it attractive to inward investment and the potential is directly related to the eastern side the town due to its ease of connection with the conurbation. The emphasis of the Local Plan policy is on the provision of good quality employment land to provide a long term benefit. It follows therefore that for the town to reach its potential, housing and employment is to be in balance and in opening up a new area the juxtaposition of uses provides for long term growth of a new quarter for the town. The Council have identified a need to accommodate growth for existing businesses, justified by key market signals in the local economy with the departure of key local employers. Given the east of the town is better connected to the larger markets of the conurbation and is the existing employment base of the town; this together with the need for existing business to expand underpins the Council's growth agenda and as such, development located close to existing business at Stanmore Business Park is the best location to meet the need.

- 2.3.51 By taking a small, strategic area of land from the edge of the Green Belt located between the town and Stanmore Business Park, there is the opportunity to create a natural extension to the town, one which visitors to the area will take as a sign of Shropshire's confidence and success, not as an indicator of the West Midlands encroaching – the affluent western edges of the Black Country conurbation will remain almost 10 miles away.
- 2.3.52 The Green Belt designation of Stanmore is not related to the quality of landscape. It should not be considered as implying that the landscape of the area is special. The landscape character is flat to gently rolling lowland agricultural farmland. The existing built form is screened by landform, woodland and field boundary vegetation, reducing inter-visibility. This contrasts to other areas around the town, notably the land at Tasley which is far more expansive in the landscape, in a larger valley where the impact of development would change the nature of the valley to a greater degree.
- 2.3.53 The land at Tasley is outstandingly beautiful, far more so than the farmed, largely featureless fields of Stanmore, which has the back-drop of a business park converted from a former RAF base. Tasley is in full view of the Shropshire Hills AONB from which all can fully appreciate its beauty.
- 2.3.54 It is clear that the exceptional circumstances that existed when the Council first approached the Apley Estate to bring forward land to accommodate the Garden Village are still relevant to justify changes to the green belt boundary to allocate the proposed development at Stanmore, especially as the Council are promoting the release of Green Belt land at Stanmore for commercial development.

Democracy and the Local Plan process

- 2.3.55 The provision of housing in the Bridgnorth area is a key Council proposal and whilst the quantum required might be the subject of different local opinions, the principal is nevertheless supported locally. However, the majority of the resident population, Shropshire Council members, Bridgnorth Town Council and surrounding parishes (the people who know the area best) want it to be located in the area that will cause least damage – that is Stanmore. In responding to Shropshire Council's Local Plan Review, Bridgnorth Town Council agreed that Stanmore Garden Community site is its preferred site and unanimously voted not to support the Tasley Site.
- 2.3.56 They also want it to be a natural success, not a development that requires many elements of mitigation that will take years to establish, if it even can be. The Council needs a scheme that can be delivered and is not subject to many risks, any of which could frustrate the scheme or mean that the promises made by the developers are not kept. Critically, they want a development that can be afforded and not one where the prices have had to incorporate excessive costs in land acquisition and mitigation works. The population want a development that does not compound existing environmental issues nor one that destroys the iconic Shropshire landscape; they look forward to a scheme that addresses the housing challenges and improves their environment. Most of all they want a scheme which is certain to be delivered, one without multiple risks to its deliverability.

Conclusion

- 2.3.57 In conclusion, there remains a choice between the Tasley scheme and the Stanmore garden community and the Council should carefully consider its position as to the allocation which will fulfil the Local Plan requirements. The Council need to decide whether to back a scheme that has a high degree of risk attached to the deliverability of the required housing supply, or one that doesn't. Amongst other things Tasley has risks associated with land acquisition, accessibility, livestock markets (health and wellbeing), highways, welfare and community facilities, as well as questions over the appropriateness of the land allocated for employment uses. Commercially the cost of mitigating these will be substantial and has to draw into question the

appropriateness of the Council supporting a proposal which may not be viable. Furthermore, to support a development that can only increase the challenges in achieving the already challenging Net Zero carbon targets of the County seems a very strange approach.

- 2.3.58 If the Council wants to deliver the housing needs of Bridgnorth without risk, with certainty and at a cost affordable to its population, Stanmore is the practical and commercial answer. An additional benefit is that it also will contribute to meeting the environmental targets of the County.

3 Proposed Pre-Submission Local Plan Policies

3.1.1 This Section sets out the representations to the specific emerging policies within the Regulation 19 Proposed Submission version, with input from the technical consultants who have been with the Stanmore Consortium to develop proposals for the site this includes a summary of the technical consultants who have been advising the Consortium.

3.1.2 The Representations call into question the plans ability to demonstrate that it can be sound.

3.2 Policies

3.2.1 To Include:

Policy/Location	Comment
<p>Policy SP2 Part 2 Strategic Approach Unsound</p>	<p>Stanmore Consortium welcome the change to SP2 Part 2 with the addition of the words ‘This local plan ensures that sufficient land <u>in the right locations</u> is available to achieve these growth aspirations...’ but considers that this is not followed through into allocations where land in the right location in Bridgnorth has not been identified. The site identified in the drfat Plan is not considered to be on the right side of the town and is not available and deliverable.</p> <p>The policy is unsound as it is not effective and may lead to under delivery of housing and employment land. SP2 Part 2 commits to keep the availability of land under review to ensure a continuous supply of suitable sites is available and it is therefore imperative that land in the right location in Bridgnorth is identified as the strategy relies on a single major garden village allocation, which if it does not deliver for any reason, means there will be a shortfall of housing in Bridgnorth.</p> <p>Whilst Policy SP2 Part 2 rightly commits to keeping availability of land under review, it does not propose any recourse in the event allocated land is later found not to be available. As such it is unsound as it is not effective.</p> <p>Policy SP2 Part 2 needs to set out or draw attention to another policy as to how it is flexible and adaptable if a major site is not available and not delivered. Policy SP7 Managing Housing Development adds some flexibility to allow housing if a shortfall in the Plans residential development guideline for a settlement arises but this could lead to ad hoc site approvals rather than planned development.</p> <p>To avoid a review of the Local plan in the case of non-delivery, which could cause significant delay, an option could be for a Neighbourhood Development Plan to bring forward an alternative.</p> <p>Stanmore Consortium consider the allocation of 1,050 houses at Tasley Garden Village in Bridgnorth will not be delivered and make representations on this matter under Policy S3. An allocation at Stanmore Garden Village is more likely to deliver a cohesive development of housing, employment and community infrastructure.</p> <p>Q5 Modification required Policy SP2 Part 2 needs to be flexible and adaptable in the event land allocated is not available and it should specify a specific course of action to rectify a situation where a site allocated is not coming forward. Such recourse should be a review of the Local Plan, a Neighbourhood Development Plan to identify alternatives or a planning application in accordance with SP7.</p>

Policy/Location	Comment
	<p>Q6 participate in examination hearing? YES</p> <p>Q7 why at hearing It is too complex to deal with in writing and will require testing of evidence</p>
Policy SP2 – (Part 3)	Support
Policy SP2 – (Part 5b)	Support
<p>Policy SP3 – Climate Change Unsound</p>	<p>Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1) remain relevant and the plan is unsound as it is not justified or effective. The policy should recognise the contribution of land use planning to support the transition to a zero-carbon economy.</p> <p>Q5 modification required SP3.1. Reducing carbon emissions through a number of means including: New criterion a. Sites for development should be located so as to reduce the distance travelled to jobs having regard to commuting patterns; and housing should be located close to jobs so as to reduce the need to travel.</p> <p>Q6 participate in examination hearing? NO</p>
<p>Policy SP4 – Sustainable Development Sound</p>	The Consortium support a positive approach to sustainable development and recognition of the presumption in favour of sustainable development in the NPPF.
<p>Policy SP5 – High Quality Design Sound</p>	<p>The Consortium support the delivery of high-quality design in new development to ensure the creation of better places; promote individual and community well-being; and enhance the way places are enjoyed and experienced by those who live, work or visit.</p> <p>Stanmore Garden Community has a focus on high quality design and as a legacy landowner the Apley Estate have the ability to deliver above the standard. One of the principles that underpins Garden Communities is:</p> <ul style="list-style-type: none"> • Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities and including opportunities to grow food. <p>At Stanmore, the Apley Estate, as a legacy landowner can deliver through the use and the control of local and regional housebuilders, a vision with building design and features relating to locally distinctive development and bring innovative design that will positively contribute to the character, appearance and local identity of the area. It will be planned as a settlement with cohesive layout and design.</p>

Policy/Location	Comment																					
	<p>At Stanmore, the Consortium will create a real sense of place that will become the heart of the development. The Community Centre will be designed for traditional retail uses such as independent butchers, bakers and greengrocers selling local produce alongside a café and associated leisure and cultural facilities in buildings where building elevations respond to their surroundings and position within the settlement.</p> <p>Stanmore is committed to the principles of Garden Village design and has recruited the renowned authority on such developments, Lord Matthew Taylor, as a principal adviser on the scheme. He is involved in the delivery of a number of Garden Communities in the UK created by Government’s Garden Communities programme.</p> <p>The Consortium will adopt a strict Design Code which will be implemented to a high standard by local and regional housebuilders. It will deliver high quality housing to a phased masterplan.</p> <p>The long-term involvement of the landowner brings the ability to powerfully enforce design quality, placemaking and planning throughout the life of the development.</p> <p>Apley Estate is a respected Bridgnorth-based landowner. It has successfully managed the 8,500 acre estate over many decades. Apley will implement a Stewardship arrangement at Stanmore, for the benefit of the community.</p> <p>The West Midlands Design Charter is fully supported and the Stanmore Consortium are fully committed to delivering high quality design.</p>																					
<p>Policy SP11 (previously DP25) – Green Belt and Safeguarded Land Paragraphs 3.96 – 3.100</p>	<p>Policy SP11 was previously Policy DP25, the change from a development management policy to a strategic policy is supported. Stanmore Consortium representations to the Regulation 18 Pre submission Draft Plan Policy DP25 (Appendix 1) remain relevant and the plan is unsound. It is not justified as the evidence base is defective for the reasons set out. The Green Belt Study methodology needs revising as set out and such revision could result in different outcomes as Stanmore Consortium consider Stanmore Garden Village does not cause the level of harm to Green Belt as the Study concludes. As a result, Stanmore Garden Village should be released from Green Belt, not just Stanmore employment allocation as proposed.</p> <p>Q5 Modification required Revised methodology of the Green Belt Study and the release of Stanmore Garden Village from the Green Belt. Consequential Modification to Table SP11.1 Green Belt Release by Location and Type to include Stanmore Garden Village which includes the Stanmore employment allocation as follows:</p> <table border="1" data-bbox="450 1792 1473 2016"> <thead> <tr> <th colspan="7">Table SP11.1: Green Belt Release by Location and Type</th> </tr> <tr> <th>Location</th> <th>Housing (ha)</th> <th>Mixed Use (ha)</th> <th>Employment (ha)</th> <th>Strategic Site (ha)</th> <th>Safeguarded Land (ha)</th> <th>Total (ha)</th> </tr> </thead> <tbody> <tr> <td>Stanmore Garden</td> <td></td> <td>70</td> <td></td> <td></td> <td>33</td> <td>103</td> </tr> </tbody> </table>	Table SP11.1: Green Belt Release by Location and Type							Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)	Stanmore Garden		70			33	103
Table SP11.1: Green Belt Release by Location and Type																						
Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)																
Stanmore Garden		70			33	103																

Policy/Location	Comment						
	Village (Bridgnorth)						
	Stanmore (Bridgnorth)			11.4			11.4
	<p>Q6 participate in examination hearing? YES</p> <p>Q7 why at hearing It is too complex to deal with in writing and will require testing of evidence</p>						
<p>Policy SP12 Economic Growth (previously SP10) Sound</p>	<p>The aims and objectives of Policy SP12 are appropriate and are supported. Bridgnorth, a Principal Centre, is well placed geographically to attract inward investment and meet economic needs. It has a high level of sustainability with a vast range of services and facilities that makes it a suitable location for growth.</p>						
<p>Policy SP13 Delivering Sustainable Economic Growth and Enterprise (previously SP11)</p> <p>Unsound</p>	<p>Policy SP13 was previously Policy SP11 in the Regulation Pre-Submission Draft Plan and now appears in a slightly amended form as Policy SP13. Stanmore Consortium representations to Policy SP11 of the Regulation 18 Plan (Appendix 1) remain relevant. The inclusion of updated employment use classes to reflect the change in the Use Classes Order 1987 (as amended) is supported.</p> <p>However, as a result of amendments, the employment policies in SP12, SP13 and SP14 together, have become overcomplicated and repetitive with the likely effect to deter employment development as there are so many strands of policy to navigate through for a development to be supported. The policies together need clarity on what they actually relate to, for example, they conflate a strategy to select sites to allocate, guiding development on allocated sites and consideration of sites not allocated. A simplified approach would be welcomed that will allow employment growth to flourish.</p> <p>The Council's approach makes the plan unsound as the policies are not effective and delivery of employment sites may be unintentionally hindered as a result.</p> <p>Q5 Proposed Modification</p> <p>The Strategy should set out the key issues for Bridgnorth in relation to delivering sustainable economic growth, Policy SP13 needs to be simplified which will allow encourage and direct development direct to meet the identified need.</p> <p>There should be recognition within the policy that development falling within new Use Class E(g) are suitable in particular uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already.</p>						
<p>Policy SP14 Strategic Corridors (Previously DP9)</p>	<p>Stanmore Consortium support Bridgnorth being within the eastern belt strategic corridor as a recognised location to attract inward investment and support growth. By way of comment, the policy is however considered to be over complicated and should focus on the allocated sites.</p>						

Policy/Location	Comment
<p>Policy 3.1 –Development Strategy: Bridgnorth Principal Centre</p> <p>Unsound</p>	<p>Stanmore Consortium object to the development strategy for Bridgnorth which is not justified or effective as the evidence base does not support the strategy to allocate Tasley Garden Village taking into account the reasonable alternative at Stanmore Garden Village.</p> <p>Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1.) remain relevant.</p> <p>Q5 Modification required The Strategy should set out the key issues for Bridgnorth and the constraints of the town that are significant in determining a strategy to direct growth and identify a deliverable development to meet the identified need. The key issues are the need for more affordable housing; addressing the imbalance between housing and employment; and improving access to community facilities and open space. The search for sites should be specified with the focus on the constraints of the settlement formed by the river and its floodplain; the landscape sensitivity to the north and south west; the physical barrier of the A458 southern by-pass; and the Green Belt to the east. Stanmore Garden Village should be recognised as a deliverable allocation for a garden village to address the key issues and have regard to the constraints of the settlement.</p> <p>Q6 participate in examination hearing? YES</p> <p>Q7 why at hearing It is too complex to deal with in writing and will require testing of evidence</p>
<p>Policy 3.1 –Development Strategy: Bridgnorth Principal Centre Schedule S3.1 (ii) Employment Allocations: Bridgnorth Principal Centre</p> <ul style="list-style-type: none"> - Land north of Stanmore Industrial Estate (P58a) - Land adjacent Hickman Road, Stanmore Industrial Estate (STC002) <p>Unsound</p>	<p>The allocation of the employment sites at Stanmore are supported as they are necessary extensions to the Stanmore Business Park (formerly Industrial Estate). The Policy has however been amended to remove use class B1 and as a result is unsound,. This is presumably to reflect the changes to the Use Classes Order, effective from September 2020 when use class B1 was revoked. The policy should be amended to add the new business use class E(g)(i),(ii),(iii) that superseded B1 as these are essential uses to allow the site to reach its potential and provide flexibility in the Plan to ensure the best chance of delivery and allow for market changes.</p> <p>The policy should also be amended to reference Stanmore Business Park, rather than Industrial Estate, as it has not been known as the Industrial Estate since 2017.</p> <p>In respect of need and exceptional circumstances for the employment allocations, Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1) provide evidence (Paragraphs 5.4.11 – 5.4.17). The case in respect of need is set out in Appendix S of those representations in report Employment Led Development of a Garden Village Community – prepared by Macmullen Associates March 2020 which demonstrates the success of Stanmore Business Park and the need for existing businesses to grow. An addendum to this report has been prepared by MacMullen Associates February 2021 to provide an updated position on occupation of the business park and alternative locations for employment in Bridgnorth (Appendix 1).</p>

Policy/Location	Comment
	<p>It confirms the business park is running at capacity with older buildings being refurbished as they become available before being re-let.</p> <p>In respect of the new use class E(g) that supersedes B1, there are uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already, for example, there are firms who undertake ultra-precision measuring and calibrating, an office use. Such uses are complementary to the engineering and the advanced manufacturing businesses on site. The existing uses are therefore in class E (g), B2, B8 and Sui Generis uses such that whilst the new employment allocation at P58a and STC002 will be focused towards the engineering and advanced manufacturing sectors, there needs to be the opportunity to complement or allow the existing employment base in all use classes to grow and to respond to market changes.</p> <p>Shropshire Economic Development Needs Assessment (EDNA) interim report December 2020 prepared by Lichfield’s on behalf of Shropshire Council shows the employment sector is predicted to undergo structural changes over the plan period with growth and decline in job sectors in Shropshire that in all scenarios forecast a workforce change with growth in office and light industrial class E(g), a fall in B2 and a near neutral position in B8. This is however Shropshire wide. Therefore, to allow for market changes and give the employment land at Stanmore the best chance of delivering employment over the plan period, the use classes should be kept as broad as possible.</p> <p>In addition, there may be some long-term shift in working patterns as a result of the Covid-19 pandemic that are not yet evident but may become established over the plan period and a flexible and responsive policy is the best option to ensure delivery.</p> <p>Q5 Modification required The first paragraph of the policy for each site should be amended with the addition as follows: ‘Development will be within primary use classes B2, B8 <u>and will include uses within class E (g) (i) (ii) and (iii), together with</u> appropriate sui generis uses. It will be targeted towards the engineering and advanced manufacturing sectors <u>to</u> complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy.</p>
<p>Schedule S3.1(i) Site Allocation Tasley Garden Village, Bridgnorth (BRD030)</p> <p>Unsound</p>	<p>Stanmore Consortium object to the development strategy for Bridgnorth which is not justified or effective as the evidence base does not support the strategy to allocate Tasley Garden Village taking into account the reasonable alternative at Stanmore Garden Village.</p> <p>Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) remain relevant</p> <p>Q5 Modification Required Tasley BRD030 should be deleted and Stanmore Garden Village (BRD032) (part) should be allocated for 70 ha comprising 850 dwellings, 16ha employment land, new local centre and green space.</p>
<p>Schedule S3.1(ii) Site Allocation Land north of</p>	<p>The allocation of the employment sites at Stanmore are supported as they are necessary extensions to the Stanmore Business Park (formerly Industrial Estate).</p>

Policy/Location	Comment
<p>Stanmore Industrial Estate (P58a)</p> <p>Unsound</p>	<p>The Policy has however been amended and as a result is unsound, to remove use class B1. This is presumably to reflect the changes to the Use Classes Order, effective from September 2020 when use class B1 was revoked. The policy should be amended to add the new business use class E(g)(i),(ii),(iii) that superseded B1 as these are essential uses to allow the site to reach its potential and provide flexibility in the Plan to ensure the best chance of delivery and allow for market changes.</p> <p>The policy should also be amended to reference Stanmore Business Park, rather than Industrial Estate, as it has not been known as the Industrial Estate since 2017.</p> <p>In respect of need and exceptional circumstances for the employment allocations, Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) provide evidence (Paragraphs 5.4.11 – 5.4.17). The case in respect of need is set out in Appendix S of those representations in report Employment Led Development of a Garden Village Community – prepared by Macmullen Associates March 2020 which demonstrates the success of Stanmore Business Park and the need for existing businesses to grow. An addendum to this report has been prepared by Macmullen Associates October 2020 to provide an updated position on occupation of the business park and alternative locations for employment in Bridgnorth (Appendix 2). It confirms the business park is running at capacity with sites refurbished as they become available before being re-let.</p> <p>In respect of the new use class E(g) that supersedes B1, there are uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already, for example, there are a couple of firms who undertake ultra-precision measuring and calibrating, an office use. Such uses are complementary to the engineering and the advanced manufacturing businesses on site. The existing uses are therefore in class E (g), B2, B8 and Sui Generis uses such that whilst the new employment allocation at P58a and STC002 will be focused towards the engineering and advanced manufacturing sectors, there needs to be the opportunity to complement or allow the existing employment base in all use classes to grow and to respond to market changes.</p> <p>Shropshire Economic Development Needs Assessment (EDNA) interim report December 2020 prepared by Lichfield’s on behalf of Shropshire Council shows the employment sector is predicted to undergo structural changes over the plan period with growth and decline in job sectors in Shropshire that in all scenarios forecast a workforce change with growth in office and light industrial class E(g), a fall in B2 and a near neutral position in B8. This is however Shropshire wide. Therefore, to allow for market changes and give the employment land at Stanmore the best chance of delivering employment over the plan period, the use classes should be kept as broad as possible.</p> <p>In addition, there may be some long-term shift in working patterns as a result of the Covid-19 pandemic that are not yet evident but may become established over the plan period and a flexible and responsive policy is the best option to ensure delivery.</p> <p>Q5 Modification Required</p> <p>The first paragraph of the policy for each site should be amended with the addition as follows:</p> <p>‘Development will be within primary use classes B2, B8 and will include uses within class E (g) (i) (ii) and (iii), together with appropriate sui generis uses. It will be targeted towards the engineering and advanced manufacturing sectors to complement the employment</p>

Policy/Location	Comment
	offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy
<p>Schedule 3.1(ii) Site Allocation Land adjacent Hickman Road, Stanmore Industrial Estate (STC002)</p> <p>Unsound</p>	<p>The allocation of the employment sites at Stanmore are supported as they are necessary extensions to the Stanmore Business Park (formerly Industrial Estate). The Policy has however been amended and as a result is unsound, to remove use class B1. This is presumably to reflect the changes to the Use Classes Order, effective from September 2020 when use class B1 was revoked. The policy should be amended to add the new business use class E(g)(i),(ii),(iii) that superseded B1 as these are essential uses to allow the site to reach its potential and provide flexibility in the Plan to ensure the best chance of delivery and allow for market changes.</p> <p>The policy should also be amended to reference Stanmore Business Park, rather than Industrial Estate, as it has not been known as the Industrial Estate since 2017.</p> <p>In respect of need and exceptional circumstances for the employment allocations, Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) provide evidence (Paragraphs 5.4.11 – 5.4.17). The case in respect of need is set out in Appendix S of those representations in report Employment Led Development of a Garden Village Community – prepared by Macmullen Associates March 2020 which demonstrates the success of Stanmore Business Park and the need for existing businesses to grow. An addendum to this report has been prepared by Macmullen Associates October 2020 to provide an updated position on occupation of the business park and alternative locations for employment in Bridgnorth (Appendix 2). It confirms the business park is running at capacity with sites refurbished as they become available before being re-let. In respect of the new use class E(g) that supersedes B1, there are uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already, for example, there are a couple of firms who undertake ultra-precision measuring and calibrating, an office use. Such uses are complementary to the engineering and the advanced manufacturing businesses on site. The existing uses are therefore in class E (g), B2, B8 and Sui Generis uses such that whilst the new employment allocation at P58a and STC002 will be focused towards the engineering and advanced manufacturing sectors, there needs to be the opportunity to complement or allow the existing employment base in all use classes to grow and to respond to market changes.</p> <p>Shropshire Economic Development Needs Assessment (EDNA) interim report December 2020 prepared by Lichfield’s on behalf of Shropshire Council shows the employment sector is predicted to undergo structural changes over the plan period with growth and decline in job sectors in Shropshire that in all scenarios forecast a workforce change with growth in office and light industrial class E(g), a fall in B2 and a near neutral position in B8. This is however Shropshire wide. Therefore, to allow for market changes and give the employment land at Stanmore the best chance of delivering employment over the plan period, the use classes should be kept as broad as possible.</p> <p>In addition, there may be some long-term shift in working patterns as a result of the Covid-19 pandemic that are not yet evident but may become established over the plan period and a flexible and responsive policy is the best option to ensure delivery.</p>

Policy/Location	Comment
	<p>Q5 Modification Required The first paragraph of the policy for each site should be amended with the addition as follows: ‘Development will be within primary use classes B2, B8 and will include uses within class E (g) (i) (ii) and (iii), together with appropriate sui generis uses. It will be targeted towards the engineering and advanced manufacturing sectors to complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy.</p>
<p>Schedule S3.1(iii) Potential Future Direction of Growth Land West of Tasley Garden Village, Bridgnorth Unsound</p>	<p>Stanmore Consortium object to the development strategy for Bridgnorth including the land west of Tasley identified as the proposed Potential Future Direction of Growth, which is not justified or effective as the evidence base does not support the strategy to allocate Tasley Garden Village taking into account the reasonable alternative at Stanmore Garden Village. Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) remain relevant.</p> <p>Q5 Modification Required Land West of Tasley Garden Village 41.5ha should be deleted and Land Safeguarded for Future Development at Stanmore Garden Village (BRD032) (part) 33 ha should be allocated.</p>

4 Supporting Documents submitted in Support of the Pre Submission Draft Local Plan

4.1 Sustainability Appraisal

4.1.1 This Section sets out the representations to the specific emerging policies within the Sustainability Appraisal, with input from the technical consultants who have been with the Stanmore Consortium to develop proposals for the site; this includes a summary of the technical consultants who have been advising the Consortium.

Policy/Location	Comment
<p>Q1 Sustainability Appraisal</p> <p>Q2 Chapter 10: Regulation 19 Pre submission Draft Plan - Table 10.1</p> <p>Q3 B sound – NO</p>	<p>Q4 Why See Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1) as comments in respect of limitations of methodology on proximity to employment and assessment of heritage assets are still relevant and no changes have been made to the Appraisal.</p> <p>In addition, Table 10.1 Assessment Matrix for the Regulation 19 SA of Sites Criteria 13 and 14 (heritage) do not match the site-specific assessments in the Annex D Bridgnorth and the criteria are different to the earlier Regulation 18 assessment. As there is no text to suggest the criteria assessment has been purposely amended, it is thought Table 10.1 has been altered in error. This needs amendment or clarification as to why it has changed.</p> <p>If Table 10.1 criteria 13 and 14 have been changed purposefully and Annex D site specific assessment is incorrect, then Stanmore Consortium object.</p> <p>As shown in Table 10.1 criteria 13 would mean a listed building within a site would not be recorded; criteria 14 would only record the top two grades of listed buildings, i.e. a grade II listed building would not be recorded; and the buffer has changed.</p> <p>Q5 Modification Required Table 10.1 should be amended and site-specific assessments amended as a consequence.</p> <p>To address SO6: Reduce the need of people to travel by car, Criteria No. 5 or 6 should be amended to add to ‘<i>site boundary within 480m of a protected employment site</i>’</p> <p>To address SO15: Conserve and enhance features and areas of heritage value and interest, Criteria No. 13 and 14 should be amended to reflect significance, not distance. Criteria 13 and 14 to be corrected with reference to listed buildings and grade II listed buildings.</p> <p>Q6 Participate in the examination – Yes</p>

Policy/Location	Comment												
<p>Q1 Sustainability Appraisal</p> <p>Q2 Annex D Bridgnorth Place Plan Area</p> <p>Q3 B sound – NO</p>	<p>Q4 Why</p> <p>In respect of Annex D Site Assessments at Bridgnorth, changes have been made which are welcomed but justification is still required in respect of TPO trees; and Stanmore Garden Village still scores better than Tasley Garden Village such that the evidence base does not support the site allocations as there is a more sustainable alternative available at Stanmore.</p> <p>It is welcomed that the Stanmore Garden Village site is now scored as whole based on the boundary of the site promoted as new site BRD032, rather than parts of sites P56/P54/P58a/STC002/STC005 as previously. BRD032 more fairly reflects the site promoted as it excludes a large area of P54 that does not form part of Stanmore Garden Village. It is scored a -5, ranked as Fair.</p> <p>BRD032 is now correctly scored as not having ancient woodland on site.</p> <p>BRD032 is now correctly scored as having medium not high landscape sensitivity.</p> <p>BRD032 however, remains with a negative score for a TPO which requires explanation. Shropshire Council confirm there are no TPO's on site. Table 10.1 Assessment matrix of the Regulation 19 SA of sites, has new footnote 2 that states TPO's within 30m of a site boundary score a negative and this distance is stated "As advised by Shropshire's Tree Team." Justification is needed as why 30m from a site boundary is an appropriate measurement to select. It goes beyond the maximum root protection area and in terms of any other indirect impact, is considered arbitrary. The location of TPO trees within 30m is also requested.</p> <p>In respect of a comparison of Tasley Garden Village and Stanmore Garden Village, the table below shows the scores. Tasley is re-scored and has moved from the rank of 'Poor' to 'Fair', the same as Stanmore. However, the range for the rank of 'Fair' is -1 to -8, Tasley is at the lowest extent of the rank at -8, while Stanmore is more favourably scored at -5. The site is ranked as follows:</p> <table border="1" data-bbox="454 1220 1273 1373"> <thead> <tr> <th></th> <th>BRD030 Tasley</th> <th>BRD032 Stanmore</th> </tr> </thead> <tbody> <tr> <td>Housing</td> <td>-8</td> <td>-5</td> </tr> <tr> <td>Employment</td> <td>-6</td> <td>-5</td> </tr> <tr> <td>Rank</td> <td>Fair</td> <td>Fair</td> </tr> </tbody> </table> <p>Q5 Modification Required</p> <p>Q6 Participate at the examination - Yes</p>		BRD030 Tasley	BRD032 Stanmore	Housing	-8	-5	Employment	-6	-5	Rank	Fair	Fair
	BRD030 Tasley	BRD032 Stanmore											
Housing	-8	-5											
Employment	-6	-5											
Rank	Fair	Fair											

4.2 Bridgnorth Site Assessments

Highways

- 4.2.1 In December 2020 the Council issued a Brief which had been prepared by WSP (Appendix 3) on their behalf in order to assess the transport implications of two urban extension sites which are currently being promoted for Bridgnorth, Shropshire. Following the issue of the Brief a review has been undertaken by David Tucker Associates on behalf of the Consortium in order to evaluate its appropriateness in evaluating the transport performance of the two Bridgnorth sites having regard to priorities set out in the emerging planning policy. The Review is included in Appendix 4 which concludes that the Brief is not fit for purpose as an appropriate document to evaluate and rank the two proposals. They advise, to avoid subsequent challenge and to withstand scrutiny at Local Plan Inquiry review on soundness of the Plan, the Brief must be refashioned and

significantly extended with purpose, objectives and means to identify the appropriate outcome for the Community (people, places, activity) in the context of adopted and emerging policy clearly stated. The current Brief meets none of these requirements.

- 4.2.2 The Consortium have set out in their submission to the Regulation 18 Stage their case in relation to highways. The key issues are as set out below.

Vehicles

- 4.2.3 The Assessment undertaken by PJA fully recognises that Stanmore Garden Community benefits from direct access from an A Road. However, in relation to Tasley as demonstrated in paragraph 4.4 above, the residential element of the Tasley site has no direct access to the A458 and access would have to be provided by a minor B road which would be entirely inappropriate for this scale of development.
- 4.2.4 The high level appraisal of the highways undertaken by PJA, concludes that the Stanmore development can be undertaken which demonstrates that with appropriate mitigation any impact on the highway network can be managed. The promoters of the Tasley Scheme have not given detailed consideration to the highway impact of the development, in particular the impact of trips from Tasley to Bridgnorth town centre, where there are known concerns with junction capacity. Given the anticipated increase in vehicle movements from the Tasley scheme through Bridgnorth, it is important to take into consideration the ability to undertake the required highway improvements, PJA have highlighted that there is very limited capacity to undertake improvements physically within the town, due to proximity of buildings; and from a land availability point of view, as the extent of the adopted highway is very limited.

Pedestrian & Cycles

- 4.2.5 Whilst both sites are a similar distance from Bridgnorth Town Centre; it is important to take into account the connectivity of the proposals with Bridgnorth. The Stanmore proposals have been designed to promote sustainable modes of travel, this includes adopting a design which promotes sustainable modes of travel and reduction in the dependence on private vehicles and which provides a Local Centre at an early stage of development, incorporating a 'park and choose' bus facility. Local bus operator Centre Bus have expressed interest in operating a bus service from the Stanmore proposal and Bridgnorth, see correspondence in Appendix 6. The Stanmore proposals also include pedestrian and cycle links across Hermitage Ridge which will provide a convenient accessible route from Stanmore to Bridgnorth Low Town.
- 4.2.6 PJA have concluded that there are significant connectivity issues at Tasley, in particular between the proposed development and Bridgnorth. The lack of available land in the control of the promoter of Tasley fronting onto A458, means any pedestrian or cycle routes would require a significant diversion away from the desire lines and result in potentially considerable connectivity challenges.
- 4.2.7 There are also significant concerns with creating the pedestrian footbridge required by site Allocation BRD030 at Tasley. PJA have concluded that it is not possible to construct a footbridge along the pedestrian and cyclist desire lines between the site and Bridgnorth Town Centre, without acquiring third party land; it is understood that the owners of the third party land have declined to make it available. PJA conclude that given the feasibility issues with delivering the footbridge, which is required to satisfy Site Allocation BRD030 in relation to connectivity to Bridgnorth, pedestrians and cyclists will be forced to use unsafe routes at grade over A458, which will be a major constraint to the development.

Heritage

- 4.2.8 Since the Consortium's submission to the Regulation 18 stage, the Council have updated its Bridgnorth Development Options Assessment at December 2020.
- 4.2.9 In addition to the paragraphs of the NPPF that the Council state and which relate to determining applications, paragraph 185 in respect of plan making is relevant. It states *“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The strategy should take into account:*
- a. The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
 - b. the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - c. the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d. opportunities to draw on the contribution made by the historic environment to the character of a place.”*
- 4.2.10 The proposals at Stanmore include enhancement to the significance of the Scheduled Monument at The Hermitage, which is at risk from decay, as the proposals can deliver improvements in terms of management, access, interpretation and in the circumstances of ongoing decay can provide a record of the past on location. The proposals would present a positive strategy in the local plan for the conservation and enjoyment of the historic environment providing wider social and cultural benefits.
- 4.2.11 Reference to such opportunities and benefits is made in NPPF paragraph 200 stated in the Councils Assessment and says local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or reveal their significance and that these should be treated favourably. The Assessment however gives no weight to the benefits the Stanmore proposal can bring and provides no evidence to show the benefits have been considered favourably.
- 4.2.12 In respect of Historic England (HE), the Consortium has sought clarification on their comments to the Council as they conflict with the position HE has expressed to Apley Estate in respect of other work to be carried out in the Scheduled area. Appendix 5 is a letter to Graeme Manton of Apley Estate from HE dated 12 January 2021 and a letter from Apley Estate to HE of 6 January 2021. It clarifies:
- HE comments on concern about impact due to scale of development, made at January 2019, were based on the information they had at the time which was the land area outlined for the new garden village in the Preferred Sites Consultation. This included a considerably larger site than now promoted and indicated development could take place within the area of the scheduling. Their comments were not based on a masterplan and in fact they were not made aware of more detailed proposals in a masterplan until 17 November 2020;
 - HE has now appraised the latest Masterplan for Stanmore and consider that it demonstrates that harm to the Scheduled Monument can be mitigated through the provision of amenity/play space creating a buffer to The Hermitage and they make recommendations how a higher level of mitigation can be secured;

- HE confirm the area for development post 2038 as shown on the latest masterplan will not impact on The Hermitage;
- HE confirm Scheduled Monument Consent was granted for cultivation of the area within the scheduling as the significance of the monument was not likely to be harmed, development would have a very different impact to cultivation;

4.2.13 Therefore, HE comments reported in the Council's Assessment are erroneous and have been superseded by their further understanding of the proposal at Stanmore based on sight of a masterplan, first seen by them on 17 November 2020.

4.2.14 It is concluded, with the favourable consideration of the proposed enhancement of The Hermitage, together with mitigation through masterplanning, Stanmore represents less risk to heritage assets than Tasley Garden Village.

4.2.15 Furthermore, as The Hermitage is beyond the developed edge of the Stanmore site, it is a logical and appropriate location for amenity space, by contrast, Grade II listed Leasows Farm and The Leasows at Tasley, are in a location where mitigation leads to dissecting the Tasley site making it difficult to provide a cohesive settlement in placemaking terms.

Ecology

4.2.16 NPPF directs local authorities where possible to allocate land of low environmental value.

4.2.17 Stanmore has no statutory designations on site. Alongside Stanmore, the Ancient Woodland on Hermitage Ridge is appropriately buffered by at least 15m to meet Natural England standards. The site is within the potential zone of influence of two SSSI's but no direct hydrological or connectivity is found between the sites and no potential impact is identified. There are four non-statutory Local Wildlife Sites within 2km of the site.

4.2.18 Tasley has no statutory designations on site. It is within the impact risk zone of four SSSI's where two present potential indirect hydrological impact as a result of pollution from the development entering Tiddle Brook. There are three non-statutory wildlife sites within 2km and an abundance of suitable habitats for European Protected Species, principally bats and Great Crested Newts. There are 6 ponds within the site boundary and a further 8 within the 500m survey distance.

4.2.19 Both sites need detailed survey but Tasley appears more sensitive.

Landscape and Visual Sensitivity

4.2.20 The Stanmore site falls entirely within Parcel 02BDG-E of the published Shropshire Landscape and Visual Sensitivity Assessment which concludes that the site has a medium landscape and visual sensitivity to residential and employment development. The Council's Development Options Assessment states that "A very small portion of the eastern extent of the site has medium-high landscape and visual sensitivity to housing and high landscape and visual sensitivity to employment". It is unclear which area this is referring to, as the Stanmore site falls entirely within Parcel 02BDG-E.

4.2.21 The Tasley site will be highly visible, being located on elevated, facing slopes over a substantial area to the west of Bridgnorth. Development will be large scale and comprise a notable extension to the built development of Bridgnorth. The open nature of the site, in comparison to the Stanmore, in relation to views from the local PRoW means that the site will form an intrusive element in the landscape to the south-west of

the settlement leading to a greater visual impact. The Tasley site is assessed to have a medium sensitivity to residential development and a medium-high sensitivity to employment development.

- 4.2.22 To conclude, the Tasley site has a higher sensitivity to employment development (medium-high) than the Stanmore site and a small part of the site has not been assessed. The Stanmore site clearly scores more positively on landscape sensitivity than the Tasley site in its suitability for residential development. It is considered that the Tasley proposal, given the nature of the site, would have a far greater impact in terms of Landscape and Visual Impact than Stanmore.

Agricultural Land Quality

- 4.2.23 On behalf of the Consortium, EDP have provided advice (Appendix P of the Regulation 18 Representations). The DEFRA Post 1988 Agricultural Land Classification (England) shows broad classifications for land around Bridgnorth but does not specifically include the land forming the Garden Community site. Natural England publishes a very large scale data set which indicates broad classifications at Grade 3 and possibly some Grade 2 around Stanmore.
- 4.2.24 The majority of the proposed 'community' land is held by the Apley Estate and farmed 'in-hand'. Apley's Land Agent observes that the land, while reasonably fertile, is formed on sandstone and, being sandy, dries out very quickly in the absence of rain. Typically, this would infer a classification of 3(a) or 3(b) is likely to be established if a fuller sampling survey is undertaken.
- 4.2.25 The same maps show other areas around Bridgnorth to be Grade 2 including land at Tasley south of the A458 part of which, next to the Garden Village site, has been subjected to a sampling survey which confirmed Grade 2 classification.
- 4.2.26 The Apley land included in the 'community' proposal forms part of the Estate's 'in-hand' holding and its loss to development would not be prejudicial to the agricultural viability of the remaining holding. Some land lying to the North and East of Stanmore Business Park proposed to be designated for Employment use is part of the former RAF station and has not been in agricultural use since about 1939

Flood Risk

- 4.2.27 The aim of the sequential test carried out at plan making stage in a Strategic Flood Risk Assessment, is to steer new development to areas at lowest risk of flooding. Development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding. If it's not possible for development to be located in zones at lower risk, the exception test may be applied (NPPF 158-159).
- 4.2.28 Stanmore is located entirely within flood zone 1 so is considered to be at low risk of flooding. It is sequentially acceptable and preferable for residential development. The vulnerability to other sources of flooding show the site is at very low risk of flooding.
- 4.2.29 Tasley is primarily flood zone 1 but has areas in flood zones 2 and 3 (high risk of flooding). Sequentially, development should be directed to Stanmore as it is possible for development to be located in a lower risk zone. At Tasley, the vulnerability to other sources of flooding shows it also has small areas in within the 1 in 30 year, 1 in 100 year and 1 in 1,000 year surface water flood risk zones.
- 4.2.30 Stanmore is sequentially preferred.

Water Quality

- 4.2.31 Source Protection Zones are shown in the Shropshire Council Water Cycle Study July 2020 and Stanmore Preferred Employment Site P58a falls in the outer catchment zone.
- 4.2.32 The Stanmore Garden Community site has been reduced in size and the land previously in the outer catchment zone is no longer part of the site. Save for the Preferred Site P58a, Stanmore is not within a source protection zone.
- 4.2.33 Tasley is not within a source Protection Zone.

Public Protection

- 4.2.34 Stanmore is close to sources of noise from road and commercial development.
- 4.2.35 Tasley is also close to sources of noise from road and commercial development, although in contrast to Stanmore, a more heavily trafficked road and the commercial development will include a relocated livestock market. Noise and odour from the livestock market will not be mitigated by trees. A buffer to give distance will take out a good proportion of the site to be allocated and if it becomes Green Infrastructure, the experience of the user will be compromised.
- 4.2.36 Tasley also adjoins an operational quarry and a further site consented for mineral extraction.

Other Strategic Considerations

- 4.2.37 Stanmore offers potential to enhance the sustainability of the existing cluster of development at Stanmore and The Hobbins.
- 4.2.38 The location of a new employment area to the west is not attractive to businesses and whilst there is an allocation already in the SAMDev, it has generated limited interest. The SAMDev allocation ELR011/a of 6.7ha will provide sufficient quantity to satisfy demand for the LPR period to 2038.
- 4.2.39 Public consultation has resulted in Bridgnorth Town Council objecting to Tasley and supporting Stanmore.

5 Conclusions

- 5.1.1 These representations follow on from those made at the Regulation 18 Stage in September 2020. The Consortium conclude that as with the Regulation 18 consultation, the Local Plan in its current form has been developed on the basis of misleading evidence as well as incorrect and superficial assessments of sites. As such, the Consortium concludes that the Plan fails to meet the tests set out in Paragraph 35 of the NPPF in relation to soundness. It is considered that the Plan is failing to deliver viable and sustainable development with positive benefits, which must seriously question whether it can deliver the strategic policies.
- 5.1.2 There are fundamental questions about the viability and deliverability of the proposed allocation at Tasley and its suitability in practical as well as planning terms. These Representations clearly demonstrate that there are major issues with the availability of the land within the Tasley site to deliver Site Allocation BRD030. Not only does the Tasley promoter not control the land required to deliver the scheme, but the land in their control is so constrained that it is not possible to provide vehicular and pedestrian access directly to the residential proposed from the A458. Connectivity to Bridgnorth is a key objective of the Site Allocation BRD030, lack of such connectivity is a significant failing that requires mitigation. However, these representations demonstrate that it is simply not possible to provide a safe and convenient access over the A458.
- 5.1.3 It is considered that the Tasley site also has risks associated with land acquisition, accessibility, livestock markets and Poultry Production units (health and wellbeing), highways, welfare and community facilities, as well as questions over the appropriateness of the land allocated for employment uses. Commercially, the cost of mitigating these will be substantial and draws into question the appropriateness of the Council supporting a proposal which has not been shown to be viable.
- 5.1.4 The representations at the Regulation 18 and Regulation 19 stages clearly demonstrate that the employment proposed at Tasley is not a suitable or economically viable location and would not be capable of being delivered; a local property agent has strongly advised that the deliverability and viability of the proposed 16 hectares at Tasley is questionable in market terms. Based upon the evidence presented, it is considered that the employment element of the scheme would not be successful. The submission at the Regulation 18 Stage demonstrates that exceptional circumstances exist to release land for Stanmore Garden Community from the Green Belt, the exceptional circumstances have been reinforced by the Council's proposal to release Green Belt for employment land at Stanmore and the Garden Community would consolidate this to deliver sustainable development.
- 5.1.5 If the Council wants to deliver the housing needs of Bridgnorth without risk, with certainty and at a cost affordable to its population, Stanmore is the practical and commercial solution.
- 5.1.6 The proposed Stanmore Garden Community will be delivered by the Consortium who include a 'legacy landowner' with the ambition to create a community on land already wholly owned which has identifiable character and style. The Stanmore Garden Community is a unique opportunity for the Council to create a new village with architecture redolent of local styles and providing a real 'sense of place' that complements Bridgnorth, comfortable in its setting and responding to its environment.
- 5.1.7 It is considered that the settlement strategy for Bridgnorth is not justified as it is not an appropriate strategy, taking into account the reasonable alternatives and fails to meet the guidance within to meet the tests set out in Paragraph 35 of the NPPF in relation to soundness. These representations and those issued at Regulation 18 Stage demonstrate clearly that the proposals for Stanmore Garden Community offers the best opportunity to deliver a development, which meets the Garden Village principles and providing significant benefits including 30% affordable housing and ensures that the required future housing needs of the area are met

without risk. In the light of these representations it is requested that the allocation at Tasley (BRD030) should be deleted and Stanmore Garden Village (BRD032) should be allocated for 70 ha comprising 850 dwellings, 16ha employment land, new local centre and green space, together with the associated 33ha of land within BRD032 for future expansion.

Appendix 1 - Regulation 18 Representations submitted on Behalf of the Stanmore Consortium (September 2020)

Shropshire Local Plan Review

*Apley Estate & Stanmore Properties,
Stanmore Garden Community*

Representations to the Regulation 18 Shropshire Local Plan Review Consultation

Prepared by JLL and Stansgate Planning on behalf of Apley Estate & Stanmore Properties

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Appendices

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D	High Level Transport Appraisal Prepared by PJA - March 2020
E	Transport Technical Note prepared by PJA – Response to SC Key Considerations
F	Andrew Dixon & Co. – Letter – 8 th July 2020
G	Landscape and Visual Site Comparison – prepared by EDP
H	Ecology Position Paper – prepared by EDP
I	Site Comparison: Heritage Matters – prepared by EDP
J	Concept Masterplan Rev C - MACE August 2020
K	A Response to Tasley Garden Village
L	Stanmore Exceptional Circumstances including Chris Young QC Opinion
M	Technical Note - Connection from Stanmore Village to Bridgnorth through Woodland - prepared by PJA
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O	Ecology Technical Note - prepared by EDP
P	Agricultural Land Quality - prepared by EDP
Q	Heritage & Archaeology Assessment - prepared by EDP
R	A Vision for Stanmore Garden Community
S	Employment Led Development of a Garden Village Community - prepared by MacMullen Associates
T	Arboricultural Appraisal - prepared by EDP
U	Shropshire Council Extract Site Assessments: Bridgnorth Place Plan Area – November 2018 Stage 3
V	Delivery Strategy and Phasing – Prepared by Stanmore Consortium
W	Statement of Public Consultation – Camargue September 2020
X	Affordable Housing Proposal for Stanmore Garden Community - September 2020

1 Introduction & Background

1.1 Introduction

- 1.1.1 These representations have been prepared on behalf of Apley Estate, Stanmore Properties and John Davies Farms, which are collectively known as the Stanmore Consortium (the “Consortium”) JLL and Stansgate Planning are instructed to make these representations on its behalf in response to the Regulation 18 Consultation of the Shropshire Local Plan Review.
- 1.1.2 These representations support the case for the allocation of land in the ownership of the consortium immediately to the east of Bridgnorth, adjacent to Stanmore Business Park, (formerly Stanmore Industrial Estate); the land is being proposed for the Stanmore Garden Community the majority of which lies in the ownership of the Apley Estate and Stanmore Properties, the remainder within the ownership of John Davies Farms.
- 1.1.3 Stanmore Garden Community presents an opportunity to deliver a new, genuine garden community at Stanmore. It is a proposal which has been adapted taking in the views of local people and will incorporate great design with zero net carbon objectives, affordability, significant amounts of green space, long term stewardship & services and facilities that the community wants delivered early in the development. It is the only deliverable site for Bridgnorth.
- 1.1.4 The information in this document underpins the Consortium’s representations to the Regulation 18 Local Plan now under consideration. The Consortium submission includes the following:
- Representation addressing issues relating to the Local Plan Strategic and Settlement Policies
 - Representation addressing the Local Plan Sustainability Appraisal
 - Representation addressing the suitability, deliverability and availability of the proposed Garden Village site allocation of Tasley
 - The Consortium Vision and Technical Submissions prepared in support of the proposals for Stanmore Garden Community.
 - A Review of Public Consultation on Tasley Garden Village and Stanmore Garden Community
 - Review of Shropshire Council’s Assessment of the Garden Village proposals in Bridgnorth.

1.2 Background to the Consortium

- 1.2.1 Apley Estate and Stanmore Properties control the majority of the land needed to deliver the Garden Community and John Davies Farms owns a minor area to the east of Stanmore Business Park. The three parties of Apley Estate, Stanmore Properties and John Davies Farms together comprise Stanmore Consortium.
- 1.2.2 Apley Estate extends to 8,500 acres around Bridgnorth. The Estate has had only three owners in the last 500 years and the current incumbents, Lord and Lady Hamilton continue the tradition of day-to-day involvement in running the estate, 2,500 acres of which they directly farm, as well as managing all the woodland, extending to 1,000 acres. The remaining land is let to long term tenants many of whom have had connections with the Estate for over 100 years. Apley’s philosophy is to maintain and preserve the heritage of the Estate while

contributing to and being involved with the local community. Its ownership includes workspace and some 300 tenanted cottages as well as the renowned Apley Farm Shop complex which is an important visitor attraction.

- 1.2.3 Stanmore Properties was founded by local builder and developer, Geoff Hickman (late of Stanmore Hall), who bought the bulk of RAF Bridgnorth when it closed in the mid 1960's. He continued its engineering heritage over a period of fifty years, with new buildings developed and occupied by a variety of local and national businesses. The company ownership is spread among a large number of family members and its day to day management is shared by the family, with professional directors and consultants adding necessary strategic expertise. The family is very conscious of its long connection with the town of Bridgnorth.
- 1.2.4 John Davies Farms are a family business with extensive land ownership at Swancote, to the north east of the site. The family has diversified its farming business into electricity generation from vegetable and organic matter through an anaerobic digestion process. The family owns land adjacent to Stanmore Business Park which can allow the Estate to expand.
- 1.2.5 For the avoidance of doubt Shropshire Council are not part of the Consortium nor is any of its land included.

1.3 Background to the Stanmore Garden Community Proposal

- 1.3.1 In October 2015 the Inspector considering the Site Allocations Plan "SAMDev" stated that the eastern side of Bridgnorth is tightly constrained by the Green Belt, which she considered limits the growth potential of settlements in east Shropshire. The Inspector acknowledged that there were limited opportunities for new development outwith the Green Belt including to the west of Bridgnorth and recommended a modification to the SAMDev which introduced a commitment to a detailed Green Belt review as part of an early review of the Local Plan
- 1.3.2 Shropshire Council were instrumental in identifying and approaching the Consortium in respect of their land holding at Stanmore , which includes the area immediately to the east of Bridgnorth with a view to proposals for a garden community to deliver the housing and employment needs of the Bridgnorth area. The Council brought key parties together to introduce the concept to be promoted through the Local Plan Review .
- 1.3.3 It was against the context of the Inspector's comments on the SAMDev that the Council considered that the Stanmore site should be the location for a garden community focusing on the existing built development and recreational use. The Council through the earlier stages of the Local Plan Review supported the development of the Consortium's proposals at Stanmore; this evolved through:-
 - Issues and Strategic Options Consultation - early 2017
 - Preferred Scale and Distribution of Development Consultation (late 2017); and
 - Preferred Sites (late 2018/early 2019).
- 1.3.4 Proposals for the Stanmore site were developed during 2018 when it became clear that two of the landowners, Apley Estate and Stanmore Properties, were interested in developing a vision to provide a new garden settlement. The concept and precise location of a garden community therefore evolved in consultation with the Council, using a combination of available landownership, with the most suitable areas of land for development.

- 1.3.5 Throughout 2018 regular meetings were held, led by the Council. In November 2018 the Shropshire Local Plan Review: Consultation on Preferred Sites was published with a masterplanned mixed use garden settlement at Stanmore as a Preferred Site.
- 1.3.6 As the proposal evolved and discussions/ consultation with stakeholders took place, it became apparent the country park was regarded as a valued local asset and concern about the loss of the country park was a prominent issue causing significant concern and objection. The matter was addressed by amendment to the proposals to exclude the country park and instead refer to ways it could be enhanced.
- 1.3.7 As the proposal evolved during 2019, Shropshire Council continued to lead and support. The Council requested more detailed technical studies and masterplanning to be presented to stakeholders and members of the public at an exhibition.
- 1.3.8 The Consortium proposals were worked up and were presented in “A Vision for Stanmore Garden Community” March 2020. The proposal was designed using Garden Village principles, the first part would be commence in the next five years and be completed by 2038.
- 1.3.9 Beyond the Local Plan period of 2038, land was to be safeguarded to allow the proposed Garden Community to expand to a total of 1,500 new homes and a further 14ha of employment land.
- 1.3.10 In April 2020 Shropshire Council completely changed its position on the Stanmore Garden Community proposal. The Council’s Local Plan’s Team sought to support an alternative proposal on land, not previously promoted and outside of the Green Belt. The Officers considered that the proposal, Tasley Garden Village, promoted by Taylor Wimpey, was able to offer a comparable garden village that outwith the defined Green Belt.
- 1.3.11 These representations seek to demonstrate that there is (as the Council has previously recognised) a strong planning case to justify the development of a Garden Community at Stanmore, including the existence of exceptional circumstances to justify removal of the site from the green belt; and that the land at Tasley being promoted as a Garden Village is neither suitable, deliverable nor available.

2 Shropshire Local Plan Review

2.1 Local Plan Procedure

- 2.1.1 The consortium wishes to raise a number of general procedural, legal and presentational concerns with the Local Plan Review 18 submission.
- 2.1.2 Firstly, we consider that the way in which the documents are presented on the website makes it very difficult for interested parties and members of the public to navigate, to understand which documents are important and what status they have as part of the Regulation 18 process. In particular, it is not made clear that all of the documents have equal “status” as part of the Regulation 18 consultation, and furthermore it does not make it clear that the Local Plan consultation welcomes comments on these documents and the promotion of alternative sites in the same way as comments are invited on the Strategic and Settlement Policies. These deficiencies mean that there is not a level playing field in terms of the options which are being consulted on for the proposed allocation in Bridgnorth. This is a fundamental flaw in the process.
- 2.1.3 It is considered that the decision of the Council to consult on the proposed allocation of the Tasley Site, without making it clear that the public have the opportunity to comment on the site assessment procedure and suggested alternative sites is flawed. There are a number of legitimate and significant reasons as to why the Tasley allocation is unsuitable. These reasons should be weighed in the balance against the other available site options and the potential mitigation measures that would be available to make the site suitable in planning terms. In respect of the proposed Tasley site it is considered the issues cannot be easily mitigated. As demonstrated in Section 4 below the allocation of the Tasley site would impact upon the economic success of Bridgnorth.

2.2 Local Plan Policies

Policy SP2. Strategic Approach

- 2.2.1 By way of a summary:
- A. The Consortium agree in principle with the strategic approach of the Local Plan Review to achieve an urban focus to development and believe that the Stanmore Garden Community proposal is the only scheme likely to deliver this successfully for Bridgnorth.
 - B. The Consortium support the overall quantum of growth for Shropshire but consider the choice of site allocation is critical in delivering it, as there is strong evidence (presented below) that Tasley Garden Village in Bridgnorth is flawed such that it is very unlikely to deliver the proposed outcomes;
 - C. The Consortium consider the Council’s affordable housing objectives clearly cannot be met without looking for greater contribution from specific proposals. an objective which Stanmore Garden Community is significantly able to assist .
- 2.2.2 The Consortium support **SP2 part 2** that states the overall provision of 30,800 new dwellings and around 300 hectares of employment land is to be delivered in the plan period 2016-2038.
- 2.2.3 The Council’s evidence base follows the policy of the NPPF and demonstrates an assessment of local housing need using Government’s Standard Methodology, a housing need of 25,894 dwellings over the plan period

2016-2038. The figure of 30,800 is therefore aspirational but recognises the Council’s wider aspirations in the economic growth strategy. The figure will provide flexibility and address the high need for affordable housing and support delivery of specialist housing to meet needs of the community. Furthermore, with increased economic growth and productivity, it will allow housing and jobs to remain in balance; reduce incommuting; and will make for much more sustainable economic growth.

- 2.2.4 To give the best chance of delivering these levels of growth it is particularly important that the right sites are allocated. Sites must be in the right locations to meet the need identified and must be capable of being delivered.
- 2.2.5 The strategic approach is stated in the supporting text as *‘to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work’* (3.21). The approach should underpin the sites to be allocated and should recognise the benefits of housing and employment in the same location and on the same site. For example, a new settlement can provide an inclusive community where people have the chance to live and work in one location which represents a sustainable pattern of growth.
- 2.2.6 The Consortium consider that the proposed allocation of Tasley Garden Village at Bridgnorth is not in accordance with this approach. It is not in the right location to meet the employment needs identified, or to address the housing needs of Bridgnorth and there are questions over whether it can be delivered.
- 2.2.7 **Policy SP2 part 3** says delivery of affordable homes is a key priority in Shropshire and aims to deliver 7,700 affordable dwellings, which equates to 25% of the total housing requirement. Whilst this is high proportion of the housing requirement, it is actually a fraction of the need identified in the SHMA 2020 which estimates 799 households a year will need affordable housing, which equates to 17,578 over the 22 year plan period.
- 2.2.8 Other policies of the Local Plan Review will deliver a proportion of the 7,700 affordable dwellings but will still fall short of the 7,700 need as the percentage required on allocated sites is based at a rate of 10% or 20% depending on geographic location. Sites will also come forward in rural areas where a specific need is identified.
- 2.2.9 Notwithstanding this, it may be desirable for certain allocations to deliver a greater level of affordable housing or low cost housing aimed at a specific need associated with the site, such as key worker housing to provide a local workforce where need is demonstrated to bring about a sustainable pattern of growth or address an existing need.
- 2.2.10 Stanmore Garden Community is based on the approach that it can deliver a higher level and variety of affordable housing to meet the identified need. The Stanmore proposal offers a minimum of 30% affordable housing, against a policy requirement 20% (See Appendix X) of the following types:
- at social and affordable rent
 - for sale/ rent (shared equity to a maximum of 75%)
 - starter homes for sale to first time buyers sold at 20% discount to market value
 - housing for sale and rent with key worker/local employment restrictions
- 2.2.11 This would provide 85 houses above the policy requirement. The Tasley proposal is based on the policy requirement and even though it is a larger scheme than Stanmore, it would still only deliver 210 affordable houses, against 255 at Stanmore.

- 2.2.12 **Policy SP2 part 5b** aims to achieve sustainable growth by focusing development in the urban areas identified. Specifically, in Principal and Key Centres which will accommodate significant new housing and employment development supported by necessary infrastructure. Bridgnorth as the third largest town is rightly identified as a Principal Centre.
- 2.2.13 **Schedule SP2.1 Urban Locations** provides a list of settlements in categories. Bridgnorth is rightly identified as a Principal Centre, it is the third largest settlement in Shropshire in terms of population and dwelling numbers after Shrewsbury and Oswestry. As the only Principal Centre in the east of the County, it needs to fulfil its role serving not just its residents but also those in its hinterland that rely on it for its extensive range of services, facilities and employment opportunities. This status in the hierarchy distinguishes it from the other tiers in the hierarchy such as Key Centres and Rural Areas, so it is right that it contributes towards the strategic growth objectives in the east of the County and accommodates significant new growth.

SP3. Climate Change

- 2.2.14 The Consortium support that development in Shropshire will help bring a transition to a zero-carbon economy. The means that can bring this about as specified in SP3 are supported but the policy should be extended to recognise how land use planning can contribute. The measures stated can be achieved in selecting the location of sites to be allocated and the benefits brought by the juxtaposition of uses. The policy needs amending.
- 2.2.15 NPPF Section 9 is about promoting sustainable transport and says *‘transport issues should be considered from the earliest stages of plan making and development proposals’* (paragraph 102). It says *‘the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help reduce congestion and emissions and improve air quality and public health’* (paragraph 103).
- 2.2.16 Directing development to the most sustainable settlements is a good starting point, but it should be recognised that within those settlements, some locations and some developments can contribute more than others to a transition to zero-carbon. For example, certain locations within those settlements will reduce commuting. In the case of Bridgnorth, as commuting is generally to the east of the settlement to employment locations such as Stanmore Business Park, the conurbation to the east and Telford to the north, a development on the east side of the settlement will significantly reduce the miles travelled by car compared to development on the south or west. Furthermore, by locating jobs next to housing, the need to travel is reduced.
- 2.2.17 In the case of Bridgnorth, it is estimated that by allocating development at Tasley Garden Village rather than Stanmore Garden Community, this will result in an additional 2 million miles of commuting a year. This is based on the Tasley promoters own consultants view that 75% of the peak time (ie workers) traffic generated would travel mainly on the single route east, across the River Severn.
- 2.2.18 Planning for juxtaposition of uses can also reduce the need to travel and in the case of Stanmore Business Park at Bridgnorth, current evidence shows that for one of the major local employers circa 72% of its employees currently commute more than 10 miles each way to and from work (the Consortiums report Employment Led Development of a Garden Village Community - Paragraph 10.4 – Appendix S). Based on the principle of connecting housing provision with employment, it is clear it can assist in increasing the availability of employees to Bridgnorth companies and would reduce the number of in-commuters. The availability of a Local Centre (with convenience store) in the Stanmore Garden Community development and potential diversion (and greater frequency of) bus services through the Business Park will also help reduce travel by

private motor car. New housing at Stanmore would be within easy walking or cycling distance of the Business Park.

- 2.2.19 Planning can and should actively manage patterns of development to reduce emissions and this should be recognised in the policy and applied in the approach to identifying sites. The location and juxtaposition of uses should be the starting point.

SP4. Sustainable Development

- 2.2.20 The Consortium support a positive approach to sustainable development and recognition of the presumption in favour of sustainable development in the NPPF.

SP5. High Quality Design

- 2.2.21 The Consortium support the delivery of high-quality design in new development to ensure the creation of better places; promote individual and community well-being; and enhance the way places are enjoyed and experienced by those who live, work or visit.

- 2.2.22 Stanmore Garden Community has a focus on high quality design and as a legacy landowner the Apley Estate have the ability to deliver above the standard. One of the principles that underpins Garden Communities is:

- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities and including opportunities to grow food.

- 2.2.23 At Stanmore, the Apley Estate, as a legacy landowner can deliver through the use and the control of local and regional housebuilders, a vision with building design and features relating to locally distinctive development and bring innovative design that will positively contribute to the character, appearance and local identity of the area. It will be planned as a settlement with cohesive layout and design.

- 2.2.24 At Stanmore, the Consortium will create a real sense of place that will become the heart of the development. The Community Centre will be designed for traditional retail uses such as independent butchers, bakers and greengrocers selling local produce alongside a café and associated leisure and cultural facilities in buildings where building elevations respond to their surroundings and position within the settlement.

- 2.2.25 Stanmore is committed to the principles of Garden Village design and has recruited the renowned authority on such developments, Lord Matthew Taylor, as a principal adviser on the scheme. He is involved in the delivery of a number of Garden Communities in the UK created by Government's Garden Communities programme.

- 2.2.26 The Consortium will adopt a strict Design Code which will be implemented to a high standard by local and regional housebuilders. It will deliver high quality housing to a phased masterplan.

- 2.2.27 The long-term involvement of the landowner brings the ability to powerfully enforce design quality, placemaking and planning throughout the life of the development.

- 2.2.28 Apley Estate is a respected Bridgnorth-based landowner. It has successfully managed the 8,500 acre estate over many decades. Apley will implement a Stewardship arrangement at Stanmore, for the benefit of the community.

- 2.2.29 The West Midlands Design Charter is fully supported and the Stanmore Consortium are fully committed to delivering high quality design.

SP10. Shropshire Economic Growth Strategy and

SP11. Delivering Sustainable Economic Growth and Enterprise

- 2.2.30 The Consortium support the principle of economic growth vision in the Shropshire Economic Growth Strategy, but they consider that the allocation of employment within the preferred allocation at Tasley will not make a meaningful contribution to delivering growth at Bridgnorth. We draw attention to the contribution Stanmore Garden Community can make as an employment led development of a garden community (See Section 5 below).
- 2.2.31 Delivery of the economic strategy is dependent on delivering the right sites, in the right locations. The strategy supports economic growth and investment in the Principal Centres, such as Bridgnorth and in ‘Strategic Corridors’ of which the eastern corridor includes Bridgnorth. There is no doubt Bridgnorth is well placed to deliver growth but to ensure delivery of the growth, it is crucial that growth is on the appropriate sites and in the right circumstances to allow it to thrive, which means locating employment, housing and facilities together in places where people and businesses want to be.
- 2.2.32 A Socio-Economic Study by Hatch Regeneris submitted with these representations (Appendix A), identifies the significance of the economy of Bridgnorth to Shropshire and the strength of the employment sector of Bridgnorth's economy.
- 2.2.33 It states:

“2.17 The concentration of specialised metals casting activity (600) jobs is underlined when it is set in the context of employment in this sub-sector in the wider area. It accounts for all of Shropshire’s employment in this sector, is more than sevenfold higher than jobs in these sectors in Wolverhampton and Telford & Wrekin, and accounts for 13% of the England total in the sub-sector.

2.18 The sector’s description perhaps understates the nature of the activity carried out on Stanmore Industrial Estate. Grainger and Worrall, with 700 employees, is the major employer on the site in this sector, and is globally recognised for the development and machining of high specification metals for the motorsport industry, and also the defence and aerospace sector. It is understood to supply Formula 1 teams.

2.20 The ONS data suggests that the period from 2013-17 saw employment increase by 750 jobs in Bridgnorth and 1,100 across the area including Stanmore Industrial Estate. This represents growth of 17% and 20% respectively, compared with 7% across Shropshire, 9% in Telford and Wrekin, a fall of 9% in Wolverhampton, and 9% in England. Much of this uplift in growth occurred between 2015 and 2017. “

- 2.2.34 The quality of the business activity at Stanmore is evidenced by the following paragraph:
- “2.27 Business level GVA data are not available for individual businesses in Bridgnorth. However, analysis of GVA per job data for the Local Enterprise Partnership (LEP) area in which Shropshire is located (The Marches LEP) suggests that a high proportion of the type of business activity located on Stanmore Industrial Estate is likely to be at the higher end of the spectrum.”*
- 2.2.35 The Report highlights the thriving local economy with the highest quality employment largely located at Stanmore.
- 2.2.36 It also states that Census data points to Bridgnorth having a lower rate of self-containment (ie people living and working in the town) than other locations. The data suggests around 39% of the town’s residents also worked in Bridgnorth, with 61% working elsewhere, the majority of which (51%) were commuting to locations elsewhere in Shropshire, with Telford and Wrekin and Wolverhampton also key out-commuting destinations. An employment and residential allocation can rebalance this position.
- 2.2.37 The importance of the right sites and circumstances for the economy to flourish is recognised in part 5a of Policy SP10 that says delivery of employment will be supported by investment in ‘housing of the right type, quality, tenure and affordability in the right locations with jobs services, facilities and leisure to make Shropshire a good place to live, work and play.’ This needs to flow through to the site allocations.
- 2.2.38 Bridgnorth is clearly important to the Shropshire economy, Stanmore Business Park is clearly a major focus of that. Further evidence on the importance of Stanmore and the opportunities it offers is in the Consortium’s report Employment Led Development of a Garden Community (Appendix S). Overall, the evidence supports growth at Bridgnorth. It demonstrates the need for expansion of Stanmore Business Park and the contribution such expansion along with housing of the right type in the right place can make to reduce out commuting, hence leading to greater self-containment of Bridgnorth.
- 2.2.39 For Policy SP10 to deliver, the allocation of Tasley Garden Village at Bridgnorth needs to be reconsidered as the economic evidence supports Stanmore Garden Community as the sustainable location for growth.

DP25. Green Belt and Safeguarded Land

(Paragraphs 4.211 - 4.221)

- 2.2.40 Policy DP25 is a development management policy designed to guide decision making. However, the explanatory justification, is about the Green Belt review, the reasons for it, how the council approached it and the outcome of the reports of their Green Belt review along with a schedule of those areas identified for release. The Consortium consider the Green Belt review methodology used for the Council’s evidence base falls short of testing all five purposes of Green Belt and consequently, doesn’t provide sufficient detail to consider overall performance of parcels assessed, specifically in respect of Purpose 3 - to assist in safeguarding the countryside from encroachment.
- 2.2.41 The Consortium have been advised in respect of Stanmore Garden Community by EDP, who have prepared a Green Belt Position Note 2, submitted with these representations (Appendix B). It is EDP’s own assessment and they present further analysis of how the promotion of Stanmore Garden Community is justified in respect of its performance against Purpose 3. They also take a landscape character led approach to determine

whether the parcels at Stanmore Garden Community contain the characteristics of local landscape character and are therefore, 'representative' of the countryside locally.

- 2.2.42 The findings of the EDP review compared to the Council's Shropshire Green Belt Assessment (2017), conclude that, given the reduced size of the site, the function of the site relative to Green Belt Purpose 3 actually diminishes in certain areas due to the effect of limited representation of key characteristics of the countryside, urbanising features and recreational access to the wider Green Belt. EDP considers that Parcels P56 (Hermitage Farm) and P57 (north west Stanmore Business Park) make no more than a 'moderate' contribution to Green Belt Purpose 3, not a 'strong' contribution as in the Council's evidence. The Stanmore site can readily provide defensible, durable boundaries to the west, south, north and east and through delivery of Public Open Space and new planting, could reinforce the defensible boundary and buffer to land separating this proposed development from the wider Green Belt to the east. These factors ensure that the site is an isolated parcel of land with functioning Green Belt buffers established by an arc of existing development. In respect of other Green Belt purposes, the Council's assessment shows the site to make either no contribution or a weak performance.
- 2.2.43 The Council's Shropshire Green Belt Review: Stage 2 (2018) identified levels of harm to the Green Belt if parcels were released. Notably, P54 (south of the A454 and Swancote) was found to cause a high level of harm if it were released. The revised site boundary for the Stanmore Garden Community now excludes most of this parcel.
- 2.2.44 In summary, the testing in the Council's Shropshire Green Belt Assessment (2017) is too limited and when reviewed by EDP using a landscape character led approach, P56 and P57 are found to make no more than a 'moderate' contribution to Green Belt Purpose 3, not a 'strong' contribution meaning the site overall, makes no more than a moderate contribution to Green Belt purposes. Furthermore, the revised site boundary now excludes a large area that was assessed at Stage 2 (2018) as having 'high' Green Belt harm. The Green Belt contribution and the harm if the revised site were released are therefore greatly reduced.

S3. Bridgnorth Place Plan Area

S3.1 Development Strategy: Bridgnorth Principal Centre

- 2.2.45 The Consortium object to the Development Strategy for Bridgnorth proposing the preferred site allocation of Tasley Garden Village on the basis it is flawed and unsound. It is considered that it is not justified as the Council's evidence base does not support the strategy, taking into account the reasonable alternatives. The Sustainability Appraisal shows the Tasley site performs poorly and there is a better alternative at Stanmore Garden Community.
- 2.2.46 Tasley Garden Village is considered to have greater impact on landscape and visual amenity; technical constraints such as access onto a B road and there are serious concerns over availability and deliverability. Our clients objections to the preferred site allocation are discussed in detail in Section 4 of these representations.
- 2.2.47 The Consortium support elements of the Development Strategy but conclude the evidence demonstrates Stanmore Garden Community is the only deliverable response to meet the needs and deliver the growth required.

The Role of Bridgnorth

- 2.2.48 Bridgnorth is rightly identified as a Principal Centre, it is the third largest settlement in Shropshire in terms of population and dwelling numbers after Shrewsbury and Oswestry. As the only Principal Centre in the east of

the County, its role is serving not just its residents but also those in its hinterland that rely on it for its extensive range of services, facilities and employment opportunities.

- 2.2.49 Its location on the western edge of the conurbation offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. As a Principal Centre its role is as a focal point and it is well placed to deliver significant growth. The role and potential was recognised by Inspector who examined the SAMDev (2015) and considered the settlement to be highly constrained by Green Belt on its eastern side that greatly limited opportunities available for the town. The Inspector considered that to accommodate the long term future of the town, it is necessary to open up new areas and Green Belt review is needed for this to happen.
- 2.2.50 The basis for growth is that the provision of good quality employment land will provide a long term benefit by improving the range and choice of investment opportunities. Employment led development is driving the growth opportunity.

Scale of Development

- 2.2.51 The number of dwellings proposed in Bridgnorth in the plan period 2016-2038 is stated as 1,800 (82 per annum). This has risen from 1,500 dwellings (75 per annum) in the previous iteration of the Plan to 2036. No explanation/justification is provided for the increase and while the Local Plan period has been extended by 2 years, this would only account for an additional 150 dwellings if the same level were projected forward, not 300. The increase needs to be justified.
- 2.2.52 The Council's completions figures (Shropshire Council's 2019 Five Year Housing Land Supply Statement) show the town was delivering an average of 75 dwellings per annum between 2006 and 2018. Data shows higher completions in certain years driven by specific sites, have been achieved with completion reaching 111 and 120 dwellings in single years. As the town has significantly underdelivered in recent years it does suggest a higher rate of completions can be achieved if land is available, to support the higher level of growth.
- 2.2.53 49 hectares of employment land is to be allocated for the plan period of which 27.4 ha is to be identified in new allocations in Bridgnorth. This would appear to exceed the justification that stated previously an additional 4 ha were needed after accounting for commitments and an additional 12 ha to provide for additional growth by existing businesses. A total therefore of 16 ha were justified and identified. The new figure of 27.4 ha represents an increase of over 70% which needs to be justified.

A Location for Inward Investment and Growth of Existing Businesses

- 2.2.54 The specific justification for the additional employment land of 12ha is to attract inward investment and provide for growth by existing businesses. It follows that this should be located where there are existing businesses thus providing them the opportunity to expand in their current location.
- 2.2.55 12 ha of employment land to provide for growth by existing business is justified by the position at Stanmore Business Park. The business park is major employer in the town, boasting about 1,700 jobs. It comprises about 59,000sqm floorspace accommodating about 40 businesses, many associated with engineering and advanced manufacturing. It is home to a number of major employers and to the Marches Centre for Manufacturing and Technology which is a state of the art training centre for apprentices. The business park is popular and in the last year has been fully occupied with demand increasing for businesses to expand in the location. At March 2020 there were only 3 vacant units. Two units were undergoing renovation before being marketed, a third was being marketed and has been subsequently let.

2.2.56 The need to allow growth at Stanmore Business Park and the benefits it can bring are set out in the Socio-Economic Study and the Consortium’s report Employment-Led Development of a Garden Community (Appendix S). It demonstrates the need for expansion of Stanmore Business Park and the contribution such expansion along with housing of the right type can make to reduce out commuting, hence leading to greater self-containment of Bridgnorth.

The Opportunity to Deliver Balanced Development

2.2.57 Evidence in the Socio-Economic study (Appendix A) and the Employment-Led Development report (Appendix S) point to lack of self-containment and significant out-commuting from Bridgnorth which can be addressed by balanced development.

2.2.58 The Shropshire Economic Growth Strategy 2017- 2021 highlights the Eastern Belt M54/A5 is a strategic growth corridor linked to investment in Telford and the clustering and supply chain opportunities from existing and future companies in close proximity to this part of the County. This is a key road and rail transport corridor which reinforces Shropshire’s close proximity to the West Midlands. It identifies a key opportunity to support the cluster of activities and key sectors in Bridgnorth and work with existing companies on future plans.

2.2.59 These objectives underpin the high housing and employment requirements for Bridgnorth. It follows that development should be located to the east of Bridgnorth as this is the area best connected and most accessible to the Eastern Belt and where the opportunities for employment are existing and can be expanded.

2.2.60 To provide balanced development with housing and employment together will secure new community facilities within a local centre and significant areas of open space. It will secure an area for new and existing workers to live and work. It will secure new infrastructure.

2.2.61 A new garden community to the east of Bridgnorth can address the evidential matters of why the growth is needed; why it is has to be in this location, what it can achieve in stemming out commuting and enhancing sustainability of the existing development at The Hobbins and the Stanmore Business Park.

2.2.62 The main constraint to development east of Bridgnorth is of course Green Belt and Green Belt boundaries should only be altered in exceptional circumstances. The SAMDev Inspector in 2015 identified the opportunities for growth of Bridgnorth were constrained by Green Belt, hence the recommendation for review. This is addressed in Section 5 of the representations on Stanmore Garden Community.

2.3 Local Plan Policy Summary

2.3.1 In summary, to draw all these factors together, the role and sustainability of Bridgnorth makes it a focus for growth and a high level of housing and employment is needed to help provide a balance and encourage additional self-containment. Locationally, to attract inward investment and to allow existing business to expand, employment has to be located at Stanmore and in a sustainable way. NPPF guidance on the best way to plan for large scale development, leads to the conclusion that a new Garden Village is the best way to provide for planned growth now and beyond the plan period. As the employment is fixed to Stanmore, it follows the Garden Village has to be located at Stanmore. This will deliver sustainable development and enhance sustainability of the existing cluster of development. Other reasonable options are considered and lead to the conclusion that exceptional circumstances exist to justify changes to the Green Belt boundaries.

3 Sustainability Appraisal

3.1 Introduction

- 3.1.1 Sustainability Appraisal (SA) is central to the tests of soundness of the Local Plan Review. This process aims to make sure that plan proposals are the most appropriate given the reasonable alternatives. At Bridgnorth, the SA demonstrates the preferred site, Tasley Garden Village, does not score as well and is not rated as highly as an alternative, Stanmore Garden Community. The evidence base therefore does not support the preferred site allocation and indicates that Stanmore Garden Community should be allocated for development.
- 3.1.2 Shropshire Council have prepared a Sustainability Appraisal and Site Assessment Environmental Report July 2020 which forms the evidence base for the Pre-submission Plan.

3.2 NPPF and Purpose of Sustainability Appraisal

- 3.2.1 In respect of the purpose of SA, the NPPF says Local Plans should be informed throughout their preparation by a SA. The SA should demonstrate how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant impacts are unavoidable, suitable mitigation measures should be considered (NPPF paragraph 32).
- 3.2.2 At Bridgnorth, the site selected at Tasley Garden Village shows significant adverse impacts and the strategy to allocate it is flawed as there is an alternative option which reduces the impacts that should be pursued. Shropshire Council have proceeded with Tasley and set out mitigation with no recognition that the impacts are in fact avoidable if the Tasley site is not allocated.
- 3.2.3 The SA findings does not support the approach of the Council and the strategy of the Plan.

Summary Assessment of Impacts

- 3.2.4 SA Chapter 1 confirms the SA has evaluated the likely significant environmental, economic and social impacts of the plan policies and site allocations. The results for Tasley and Stanmore are shown in the Table below.

<i>Bridgnorth</i>							
	Site Name	Tasley	Stanmore				
Plan Stage	Site Reference	BRD030	P54	P56	P58a	STC002	STC005
Preferred Site SA rating HOUSING		Not included at this stage	Poor	Fair	Fair	Fair	Fair

Preferred Site SA rating EMPLOYMENT		Not included at this stage	Poor	Poor	Fair	Fair	Fair
Pre-Submission Draft Local Plan SA Rating HOUSING		Poor	Not carried forward	Not carried forward	Not carried forward	Not carried forward	Not carried forward
Pre-Submission Draft Local Plan SA Rating EMPLOYMENT		Fair	Not carried forward	Not carried forward	Fair	Fair	Not carried forward

- 3.2.5 At Tasley, it is noted that part of the preferred site south west of Roundthorn Farm is parcel reference BRD023 but there is no recognition of this in the report of the SA. As the whole Local Plan and SA is on the basis Tasley Garden Village is BRD030 it is assumed that BRD023 is not relevant and therefore has not been reviewed in this assessment.
- 3.2.6 At Tasley, housing is proposed on the area rated ‘Poor’, an area expected to deliver 1,050 houses in the plan period and more beyond, a significant scale of development when an alternative offers less significant effects.
- 3.2.7 At Stanmore, housing is proposed on P56 rated ‘Fair’, an area expected to deliver 850 houses. Employment of about 5ha is proposed on P54 rated ‘Poor’ but this equates to less than 10% of the area of land in P54. All other parts of the Stanmore proposal are on land rated ‘Fair’.
- 3.2.8 Stanmore clearly has less significant effects and is more sustainable than Tasley based on the Council’s assessment conclusions.
- 3.2.9 When the details of how the assessment conclusions are reached are studied it becomes clear that actually Stanmore scores better than the Council show, partly due to the revised site area reducing the impacts and partly because it has been mis-scored in places. This is discussed further below after the process of scoring is explained to aid understanding of the scoring and outcomes.

3.3 Methodology

- 3.3.1 SA Chapter 2 sets out the methodology for scoring and lists a complex set of objectives. Each land parcel is tested against 15 different SA criteria. It includes a description of effect and scoring on significance of the effect using scores double negative(- -), negative(-), neutral(0), positive(+) and strongly positive(++). The sustainability objectives are set out to assess sites for allocation. The criteria and scoring system are then translated into an assessment matrix which is used to assess sites. The scoring system is set out and applied to the sites in a spreadsheet - for Bridgnorth SA Appendix D is Bridgnorth Place Plan Area Site Assessments August 2020.

- 3.3.2 The negative and positive marks for each site were combined to give a numerical value. For those settlements with more than 10 SLAA sites, the lowest and highest values for that settlement were used to determine a range. The range was then divided into three equal parts. Those sites in the lowest third of the range were then rated as 'Poor', those in the middle third as 'Fair' and those in the upper third as 'Good'.

3.4 Limitations of the Methodology

- 3.4.1 There are two limitations identified in Shropshire Council methodology where the methodology falls short. The first is what is included in the baseline information and the second is the way the SA objective (SO15) assess heritage.
- 3.4.2 On the first limitation, baseline information should draw on the key sustainability issues facing Shropshire. One of the key issues is climate change and SA objective SO6 'Reducing the need of people to travel by car' has not been adequately considered in the assessment process. In Bridgnorth particularly, there is a need to increase self-containment and reduce in and out commuting which generally takes place by car. Self-containment can be increased and commuting reduced by providing good access between housing and local jobs and this can be achieved by focusing development in accessible locations. Even in locations where self-containment is not an issue, it is a sound land-use planning principle to reduce the need to travel and therefore locating development for housing near employment and vice versa is an important objective to achieve sustainable development. A reduction in the need to travel by any means but particularly by car between housing and jobs, will bring a reduction in commuting and reducing the miles travelled can contribute positively to the climate change emergency.
- 3.4.3 To address that, an additional criteria 6 should also be added for 'An employment area within 480m of the site boundary' where Yes = plus score (+) and No = minus score (-).
- 3.4.4 A change was made as a response to comments received to the Preferred Sites Consultation that was translated into criteria 6 in the Scoping Report as 'Regular peak time public transport service within 480m of the site boundary'. For consistency the same distance is suggested for an additional criteria 6.
- 3.4.5 On the second limitation, concern is raised over the way heritage is assessed. The SA scores sites on the basis of their proximity to designated heritage assets using firstly criteria 13 whether a site has a designated asset within the site boundary; and secondly, criteria 14 whether a site falls within a standard specified distance. In the case of SA for another authority in the West Midlands, Historic England have expressed concerns about the limitations of this approach. It is effect on significance rather than proximity, of each allocated site and reasonable alternative, that should be assessed. An assessment of significance of heritage assets is required so a sensitivity rating can be used and a highly sensitive site would have a significant negative effect.
- 3.4.6 Therefore, an assessment of sensitivity should be used to assess potential impacts, rather than proximity.

3.5 Limitations and Inaccuracies of Scoring

- 3.5.1 The Stanmore site should score more favourably than it does. Obvious inaccuracies are that P56 does not have any Tree Preservation Orders on site (Criteria 3) (See Arboricultural Appraisal, Appendix T). Neither does it include any Ancient Woodland (Criteria 1) as that falls within adjoining P55. It is also scored as 'high' landscape sensitivity (Criteria 15) when in fact it is medium. P56 clearly scores more favourably than the assessment shows.

- 3.5.2 Furthermore, P56 scores a double negative for having a Scheduled Monument within the site. Currently, the scheduled boundary covers a minute area on the north west edge, the site boundary could be redrawn fractionally and the scheduled area would be removed from within the boundary. The subtlety of a site boundary can make a difference to a score.
- 3.5.3 All Stanmore sites should be attributed a positive for coming within 480m of accessible natural green space (Criteria 5) as Stanmore Country Park is on their boundaries.
- 3.5.4 P54 scores a negative as it would displace an existing waste management operation (Criterion 12). Notably the only such operation is at Swancote which is outside of the parcel although adjoining and would certainly not be impacted by the development proposed as Stanmore Garden Community which is on the western extremity of the P54.
- 3.5.5 A re-scoring of P54 could result in a change of the rating for housing and employment from 'Poor' to 'Fair' as it is close to the rating band edge of -8 for housing (score -10) and -9 for employment (score -11).
- 3.5.6 One of the deficiencies of the SA tool is that a 'criteria description' may only apply to a small part of a parcel yet the whole parcel is blighted by it giving the impression of significant effect when the reality is the criteria description is not representative of the whole parcel. For example, P54 covers an area over 2km across, it scores a negative for displacing an existing waste management operation when in reality that relates to the eastern extremity of the parcel. The facility is not within the site and not even close to the Stanmore Garden Community. It would not be displaced by the new village, in fact it would supply electricity made from waste to the new village, which should be seen as an environmental benefit.
- 3.5.7 In a similar vein, all sites score a negative for being wholly or partly grade 1 or 2 or 3 agricultural land (best and most versatile). As there is no accurate survey it is not known what percentage of the parcels are classified as best and most versatile yet the possibility of a small part and may be not even in the development area scores a negative.
- 3.5.8 Even with inaccuracies and deficiencies of the process, Stanmore is still rated as 'Fair' for the elements proposed, save for the western extremity of P54 which is rated 'Poor' for employment. As that relates to such a small part of a very large parcel the effect cannot be considered representative of the reality.

3.6 Significant Effects for Site Allocations - Mitigation

- 3.6.1 Sites rated as 'Poor' are considered to have likely significant adverse effects for which mitigation measures should be proposed. In the case of Bridgnorth, as there is an alternative site that is not 'poor' rated, there should be no need for mitigation and before looking to mitigate the alternative site should be favoured.
- 3.6.2 BRD030 Tasley is rated as 'Poor' for Housing, and mitigation is proposed to address the three reasons that lead to the 'Poor' rating as stated in the SA and set out below. The necessary mitigation is however in doubt:

1. *The site is not within walking distance (480m) of many services and facilities* - Mitigation Proposed - includes measures to provide facilities on site and connections to Bridgnorth.

Attention is however drawn to the requirement to mitigate by providing '*significant and effective pedestrian and cycle links.*' This is stated to include as a minimum '*pedestrian and cyclist footbridge crossing of the A458*

at an appropriate location near Ludlow Road roundabout, subject to ground investigations and available land.' Therefore, to mitigate the 'Poor' rating it is essential such links can be delivered as part of the proposals. To ensure mitigation can be satisfactorily achieved, it must be demonstrated now that the necessary links are capable of being delivered. The Consortium doubt this can be achieved in a satisfactory way and this is discussed in the section of the representations on Tasley.

2. *Part of the Site is within Flood Zones 2 and 3* - Mitigation Proposed - a suitable drainage strategy is required and no development should take place in the areas at high risk of flooding. It should be demonstrated now that all development including access roads can be achieved on areas at low risk of flooding, taking account of other constraints that affect layout such as buffers for the livestock market and listed buildings. Locating open space in the areas at high risk of flooding compromises the recreational use and additional land might be needed.

3. The site contains a Listed Building - Mitigation Proposed - through design and layout should reflect and respect the heritage assets. Green Infrastructure can create appropriate settings although this is yet to be demonstrated.

3.7 Summary

- 3.7.1 The findings of the SA do not support Shropshire Council's approach and the strategy of the Plan. The SA demonstrates the preferred site, Tasley Garden Village, does not score as well and is not rated as highly as an alternative, Stanmore Garden Community. The evidence base therefore does not support the preferred site allocation and the approach does not accord with the policy of the NPPF that requires an alternative with a lesser impact should be considered.
- 3.7.2 In addition, there are some scoring inaccuracies and distortions of the outcome due to the nature of the assessment process that would show Stanmore scores more positively than allowed for which further reinforces the conclusion that the evidence shows it should be favoured over Tasley.
- 3.7.3 To address limitations of the methodology a new criteria 6 should be added for 'An employment area within 480m of the site boundary'. In addition, an assessment of effect on significance of heritage assets need to be undertaken, to assess potential impacts rather than relying solely on proximity.

4 Tasley Housing Allocation

4.1 Introduction

- 4.1.1 In early 2020 the Planning Officers within the Local Plans Team at Shropshire Council decided to change their position on supporting the Garden Community at Stanmore. The Council Local Plans Team determined that they would no longer support Stanmore and sought to bring forward an alternative proposal on land not previously promoted and outside of the Green Belt. The Officers considered that a proposal, Tasley Garden Village, promoted by Taylor Wimpey was able to offer a comparable garden village outside of the Green Belt.
- 4.1.2 We have set out in detail below the technical reasons why the Tasley proposal is unsound on the basis that the land is not suitable, deliverable or available to deliver Site Allocation BRD030 under Settlement Policy S3.1.

4.2 Availability and Deliverability of the Site

- 4.2.1 The Consortium considers that there are significant issues relating to the availability of the land within Site Allocation BRD030 at Tasley and also major issues with the deliverability of the site for the Garden Village proposals as suggested in the Taylor Wimpey Development Statement.
- 4.2.2 We have previously commented that the land promoted by Taylor Wimpey, known as the Tasley Garden Village is not entirely in their control. The proposal within the Regulation 18 Local Plan for the Tasley site (Proposal BRD030) shows a much reduced site area for the initial phase of development compared to that promoted by Taylor Wimpey. Given the reduction in site area and the issues highlighted below regarding the deliverability of the Tasley Site there is a serious question as to whether the housing and employment proposed at Tasley Garden Village can be delivered within the Plan period. Notwithstanding the reduction in the scale of the proposed garden village, we consider that there are still significant issues with the control of Site Allocation BRD030.

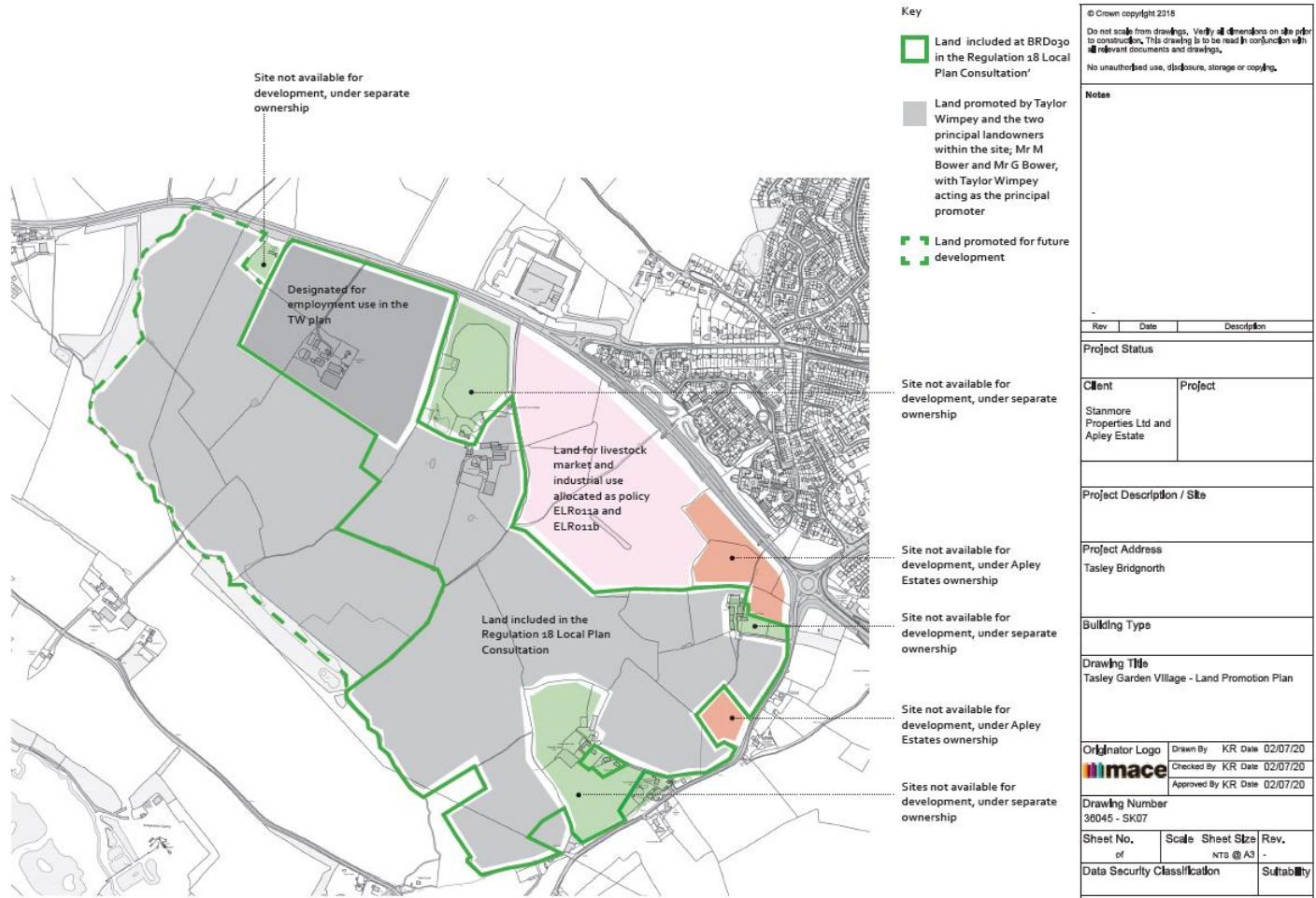


Figure 1 – Tasley Land Ownership

- 4.2.3 It is clear that there are still a number of parcels of land which do not fall within the control of Taylor Wimpey. This includes three parcels of land, at Hundred House Farm, Leasowes Farm and Footbridge Farm. This Plan demonstrates that a development of a Garden Village on the site will be extremely challenging.
- 4.2.4 The ownership plan above clearly shows that there is a major issue with the lack of frontage to the A458; not only does this raise an issue with gaining vehicular and pedestrian access to the proposed development, it also shows that the area identified for residential development is highly constrained. As stated in the Transportation Issues section at Paragraph 4.4 below the lack of availability of road frontage fails to meet the requirements set out in Site Allocation BRD030, which requires access points from the A458. As the ownership plan demonstrates, the only prospect of a dedicated access is via B4364, which in the opinion of the Consortium's Transport Consultants would be unacceptable in highway terms.

4.3 Livestock Market

- 4.3.1 The proposed relocation of the Livestock Market within Bridgnorth must be a key consideration for the Council and for the Local Plan. As the Council will be aware the Livestock Market has well developed plans to relocate from the existing site to a new location in Tasley (ELR011b). This relocation allows for the existing site to be allocated for redevelopment of a mixed use development including 500 new homes within the Town, allocation (BRID001/BRID020a).
- 4.3.2 The operator of the Livestock market has made its position very clear to the Council about their concerns regarding the impact of Taylor Wimpey's housing proposals at Tasley upon their proposed relocation, (see letter from Livestock Market Operator's Agents at Appendix C)
- 4.3.3 When considering the deliverability of the Livestock Market it is important to take into account the potential impact of the relocated Market on future proposals due to the effect of the development on living conditions and health. The Livestock Market is not only a noisy operation, but will inevitably result in issues of odour. The Livestock Market operates on a basis that animals arrive very early in the morning and are frequently noisy and require time to settle, this together with the loading and unloading of stock can cause amenity issues. Based upon the existing operation there will be considerable number of lorries, tractors, trailers and transporters, together with cars attending the site, a number of which will be fitted with reversing alarms.
- 4.3.4 It is considered by the Livestock Market operator that based, upon experience, relocating the Livestock Market close to new houses is almost certainly likely to raise significant issues in relation to noise and odour nuisance. Given the area of land shown within the proposed Tasley allocation is now limited in width, it is considered that the scope for mitigation would be difficult. Neither the Council nor Taylor Wimpey in their submission have made any assessment of the potential impact of new housing on the operation of the Livestock Market, which is likely to face a large number of complaints as a result of noise and odour; the Livestock Market operator has stated clearly that in these circumstances they would not be willing to relocate. This clearly will in turn, impact on the delivery of an existing allocation for 500 new homes in Bridgnorth on the land to the north of the A458 (BRID001 & BRID020a).
- 4.3.5 On this basis it is considered that the impact on the Livestock Market and its important role within Bridgnorth has not been taken into consideration and as such the proposed allocation cannot be justified or considered to be deliverable and therefore would be unsound on this basis.

4.4 Transportation Issues

- 4.4.1 Site Allocation BRD030 for Tasley states that the proposed Tasley Garden Village, Bridgnorth will require a “suitable number of appropriate designed and constructed pedestrian, cycle and vehicular access points will be provided.” It also states that access from the A458 will be required to compliment the proposed roundabout access to the Saved SAMDev Plan allocations i.e BRID001/BRID020b, BRID020a, ELR011/a and ELR011b.
- 4.4.2 Site Allocation BRD030 for Tasley clearly states that “significant and effective pedestrian and cycle links will be provided over the A458 to encourage safe and sustainable patterns on movement between sites and the wider town”. It also states that this will include but not be limited to a raised pedestrian and cyclist footbridge crossing of the A458 at an appropriate location near the Ludlow Road roundabout, *subject to ground investigations and available land*. The Consortium take the view that if the Council requires provision of a ‘raised...footbridge’ to reach a standard of safety, it cannot then limit or reduce that required standard simply because the promoter is unable to comply with it.
- 4.4.3 The consortium have undertaken their own technical studies to demonstrate that the land within site Allocation BRD030 which is within the control of Taylor Wimpey is neither suitable or available, nor would it satisfy the requirements for access within Site Allocation BRD030.
- 4.4.4 PJA Consultants have prepared a Technical Transport Note (Appendices D & L) which reviews the proposals for Tasley Garden Village from a highways’ perspective. Their review highlights a number of major issues relating to the soundness of the Tasley proposal from a delivery point of view.
- 4.4.5 The proposal for Tasley identifies a new priority junction onto the A458 which will form the secondary vehicular access to the residential element of the site. This means that throughout the early stages of the residential development (until the western part of the spine road through the site is complete), given the ownership constraints, access can only be provided from Ludlow Road, which is a minor B Road. On the basis that the access from Ludlow Road will have to form the primary access for the majority of trips generated by the residential element of the site, such an arrangement does not meet the requirements of Site Allocation BRD030 and would be totally unsuitable for this scale of development.
- 4.4.6 The Local Plan proposal for Tasley clearly states that “significant and effective pedestrian and cycle links will be provided over the A458 to encourage safe and sustainable patterns of movement.” It is clear that a footbridge will be required. There are significant concerns relating to the feasibility of providing a footbridge along the desire lines, and the linkages to it, or indeed at all, as set out within the PJA review of the Tasley Garden Village proposals(See Appendices D & L). In summary the main issues are :
- It is not possible to deliver the footbridge without the use of third party land for construction (required land is within ownership of The Apley Estate who have declined to make it available). The ability to deliver a footbridge, which has been deemed as a necessary element of the proposal, is therefore not possible.
 - The development proposals must facilitate both pedestrian and cyclist trips into Bridgnorth. A bridge to accommodate cyclists as well as pedestrians (3m width ramps and bridge deck) would not fit within highway boundary and therefore, cyclists would be required to cross at grade at the Ludlow Road/A458 roundabout. PJA conclude that without significant improvements to cycling facilities at this roundabout, it would not meet relevant guidance and there would be no safe route for cyclists to access Bridgnorth town centre from the site.

- It is clear that the proposed improvements to the PRoW depends on the agreement of third party landowners. The Apley Estate control the PRoW that links to the A458 and will not be in agreement to any upgrade proposals. Without this link it will lead to a diversion of 300m to Ludlow Road before crossing the A458 (either via a bridge or at-grade crossing) to avoid further diversion. It is considered that a diversion away from the desire lines would be a highly unattractive route for pedestrians or cycles and would also undermine any bridge proposals. However, PJA question whether a ‘diverted’ route via Ludlow Road is deliverable, as highway land to the north of the A458 roundabout required for construction appears insufficient to accommodate engineering works and retaining structures; and relocation of a Vodafone mobile phone mast and cabinets will be necessary with no indication that Vodafone would or could re-site their equipment (there being no obvious alternative site available).
- The enhanced public transport links proposed for Tasley Garden Village, would require a significant diversion of an existing bus service. Currently, the nearest existing services route along A458 to the north of the site, and Wenlock Road.

4.4.7 PJA conclude that from a highways’ perspective, the ‘Garden Village’ at Tasley is not an appropriate location to include as a mixed use allocation in the Local Plan. To ensure mitigation can be satisfactorily achieved, it must be demonstrated now that the necessary links are capable of being delivered. A review of the documentation for Tasley Garden Village has demonstrated that there are significant concerns regarding the feasibility and deliverability of providing safe pedestrian and cycle links along key desire lines into Bridgnorth, using land within the applicants’ control.

4.5 Employment Provision at Tasley

4.5.1 Proposed Site Allocation BRD030 of the Local Plan Review clearly states that employment provision will represent an intrinsic element of the development, occurring alongside and cross subsidised by the provision of housing. The Site Allocation requires that employment land be located in a gateway location on the site and be of a high-quality design and layout. The Local Plan Review states that the Site Allocation BRD030 should provide an opportunity for freehold employment land targeted towards the objectives of the Shropshire Economic Growth Strategy. The Growth Strategy states that the objective for Bridgnorth is to support the cluster of activities and key sectors in Bridgnorth and work with existing companies on future plans. It also identifies the need to work closely with the Marches Centre for Manufacturing and Technology in the development of a satellite Growth Hub based in Bridgnorth. Allocating land to the west of Tasley is considered to be contrary to the objectives of the Shropshire Economic Growth Strategy and therefore is counter to the employment aims of Site Allocation BRD030.

4.5.2 There is no evidence presented by the Council in support of the Local Plan to demonstrate the provision of further employment land at Tasley is required or would be delivered in this location.

4.5.3 The Consortium has serious concerns about the likelihood of development of employment land to the west of Bridgnorth being delivered, on this basis the expert advice of local agents Andrew Dixon and Co (Appendix F) has been sought.

4.5.4 Andrew Dixon & Co have advised that the deliverability and viability of the proposed 16 hectares at Tasley is questionable in market terms. Andrew Dixon questions Taylor Wimpey’s track record in delivering employment land, which is considered by the Council to be a key element of the Garden Village; the Agents view is influenced by the fact that 6.7 hectares of employment land is already allocated through the SAMDev

2015 Plan for employment. Based upon the evidence presented by Andrew Dixon, the Consortium consider that the employment element of the scheme would not be viable or deliverable.

4.5.5 Andrew Dixon concludes that the land allocated for employment at Morville Heath is not a suitable industrial location due to site being on a secondary route with limited transport links. The employment market in the area is dominated regionally by Telford and locally by Stanmore Business Park. The Agent's view is that a development to the west of Bridgnorth is not considered to be viable and therefore would require significant cross subsidy from the residential development. No evidence has been presented by the promoters of the Tasley site or the Council to show how the employment, which is considered to be an important element of the Site Allocation BRD030 and a key part of the Garden Village principles) would be delivered. As set out in Government advice in the National Planning Policy Guidance, in relation to viability, understanding the viability of a scheme is critical to the overall assessment of deliverability. The Consortium consider that without a clear demonstration as to how the employment can be viably delivered to meet the Site Allocation requirements, the proposal cannot be justified or demonstrated to be deliverable and therefore is unsound.

4.6 Landscape & Visual

4.6.1 EDP are advising the Consortium on the landscape impact issues. The primary concerns with regard to the Tasley site, reported in the baseline LVAs, are its prominent location, open character and visibility from the south-west including from the local rights of way network, the promoted and regionally significant Jack Mytton Way, minor rural roads and local residential dwellings. The key issues identified by EDP set out in Appendix G) are set out below:

- The Tasley site will be highly visible, being located on elevated, facing slopes over a substantial area to the west of Bridgnorth (as shown in Image EDP 2.1 and 2.2 – Appendix G). Development will be large scale and comprise a notable extension to the built development of Bridgnorth;
- The Tasley site is assessed as having a detrimental impact in regard to (single or group) Tree Preservation Orders (TPOs) within the site. TPOs are acknowledged to limit the sites capacity for development and mean that development on the site would be subject to an assessment of impact on these protected tree(s) in order to demonstrate how they can be safeguarded. However, potential impacts can be mitigated with appropriate buffers;
- The open nature of the site, in comparison to the Stanmore land, in views from the local PRoW means that the site will form an intrusive element in the landscape to the south-west of the settlement leading to a greater visual impact;
- Views from PRoW include those from six PRoW located within the site. Visual receptors on the Jack Mytton Way are of very high sensitivity and it would be difficult to mitigate these views due to the sloping nature and aspect of the site combined with the more elevated location of the visual receptors;
- The broad visibility to the site, which will be difficult to mitigate due to its elevated sloping nature, will make it difficult to limit the effect of the proposals on landscape character; the character of the settlement; and the perception of urban sprawl that will inevitably occur as a result of development of such a large site; and
- Views to the site from local residents are limited and dispersed, they include a small number of dwellings and farmsteads off Ludlow Road and connecting minor rural roads on higher ground that

overlook the site. There are two listed buildings present on the site, 'The Leasowes' and the 'Former Farm House at The Leasowes'.

- 4.6.2 With regard to the visual impact of the site, the LVA doesn't give any indication of the magnitude of change of adverse effects which are likely experienced by each receptor group, despite there being a developed masterplan. The collective impact of the development is therefore not fully understood. The LVA simply states that "a precautionary default approach to the assessment has been adopted whereby visual effects are considered adverse (unless stated otherwise)". The majority of the discussion regarding potential effects on receptor groups is focused on the use of proposed landscape mitigation to reduce the level of adverse visual effects. Mitigation planting takes a long time to mature and shouldn't be solely relied upon. The development proposal of Land at Tasley will inevitably change the character of the landscape within a large geographical area and result in irreversible impacts on views to and from the site.

4.7 Design Principles

- 4.7.1 The Local Plan Site Allocation BRD030 for Tasley identifies the land at Tasley for a comprehensive mixed use sustainable urban extension, where development will comply with the principles of a garden village as identified in a Garden Communities Prospectus and the TPCA Garden City Standards guidelines and any updated equivalent guidelines.

- 4.7.2 On the basis that this development is promoted as a Garden Village it is important to consider how the proposal performs against the principles which are set out in the TPCA guidelines. These are considered below:-

Land Value Capture for the Benefit of the Community

- 4.7.3 There is no reference within the scheme promoted by Taylor Wimpey of the land value capture. This issue is a key commitment to the place being owned in part by its community and the promoter needs to commit to community investment to ensure the right mix of housing, affordability and long term stewardship of the landscape and parkland.
- 4.7.4 It is considered that without this principle being embedded within the proposal there would be no long term stewardship of the settlement.

Strong Vision, Leadership and Community Engagement

- 4.7.5 The level of community engagement on this proposal has been extremely limited, particularly when compared to the Stanmore proposal. It is also relevant to consider that there has been significant opposition to this proposal from the local community including objections from Tasley Parish Council, Bridgnorth Town Council, and Morville Parish Council.

Community Ownership of Land and Long Term Stewardship of Assets

- 4.7.6 There is no reference whatsoever within the consultation undertaken on the Tasley site on community ownership or stewardship.

Mixed Tenure Homes and Housing Types that are Genuinely Affordable

- 4.7.7 To satisfy this requirement there needs to be a real commitment to affordable homes for local residents. There is no evidence of such a commitment in the Tasley proposals. Whereas the Stanmore proposals provide very specific local housing requirements and provision. There has been no regard to the mix of tenure and affordable housing within the Tasley proposal.

A Wide Range of Local Jobs in the garden city within easy commuting distance of homes

- 4.7.8 Whilst the scheme includes an area of employment, as stated above there are serious concerns about how this could be developed. The Site Allocation for Tasley acknowledges that there may be a requirement for cross subsidy of the employment element. Based upon advice from Local Agents, Andrew Dixon, there is significant doubt as to whether there is any real demand for the employment development especially in this remote location. The main established employment areas lie to the east of Bridgnorth, the development of which would be supported by the Shropshire Economic Growth Strategy. As a consequence, any development of new homes in Tasley will result in a need to commute to the east resulting in congestion in Bridgnorth itself.

Beautifully and imaginatively designed homes with gardens combining the best of town and country to create healthy communities and including opportunities to grow food.

- 4.7.9 The proposals which have been consulted upon for the Tasley site simply identifies standard house types which are neither beautiful, imaginative or reflective of the character of Bridgnorth which would be required within this principle.
- 4.7.10 It is anticipated that Taylor Wimpey will use its standard national house types rather than creating characterful homes based on the Bridgnorth vernacular. Whereas the Stanmore proposals would follow the recommendations of the report Living with Beauty, the report of the Building Better, Building Beautiful Commission.

Development that enhances the natural environment providing a comprehensive green infrastructure network and met by diversity gains and that uses zero carbon and positive technology and core climate resilience.

- 4.7.11** The proposals which have been issued for Tasley present no evidence to distinguish this proposal from a standard suburban amenity space, nor is there any commitment to achieving net carbon zero settlement. Shropshire has declared a climate emergency and therefore this should be required for such an aspirational proposal. It is also important to develop strong cultural, recreational and shopping facilities which are walkable in social, vibrant neighbourhoods. The viability of a proposed neighbourhood centre on this allocation is questioned given that this is proposed within the land to the north of the A458. It is also important to highlight the difficulties that are presented within this site in terms of its connectivity to Bridgnorth and the difficulties of achieving a viable crossing of the trunk road.
- 4.7.12 The proposals for the Tasley site indicate that there is easy access into Bridgnorth however, as stated in the transportation section above there are no details of the crossing of the trunk road and following a technical review of this it is considered that such a crossing is highly unlikely to be achieved given the lack of land ownership along the frontage to the A458. It is considered therefore that it would be impossible to meet this principle objective as set out in Site Allocation BRD030.

Further Design Issues

- 4.7.13 It is clear from a review of the proposals for Tasley that they do not satisfy the Garden Villages Principles and therefore they fail to comply with the requirements to the Site Allocation. It is clear that the development is a Garden Village in name only and a standard suburban layout in practice.
- 4.7.14 As stated above the transport and accessibility issues are extremely important, particularly its connectivity with Bridgnorth. The publicised proposals suggest provision of a grade separated bridge over the A458. This is not included on the masterplan and it is notable that the promoter's Transportation consultants maintain that a high-level crossing 'isn't necessary'. It is considered that even if it were feasible to construct a crossing, a single point of access via a bridge across the road is an unattractive method of moving between the site, the local centre and Bridgnorth town centre. It is considered that such a structure would create a psychological barrier to movement (as well as being visually intrusive to nearby houses) encouraging the community to use private cars instead or to cross roads on foot in potentially unsafe places.
- 4.7.15 The local centre is stated to include a primary school. The marketing information states an area of 1.2ha for this. This is very small and based only on a 1 Form Entry school. It is considered that this would be inadequate, and the area would need to be increased to 2ha to accommodate flexibility for a 2 Form Entry primary School

4.8 Ecology & Biodiversity

- 4.8.1 EDP has reviewed the Tasley submission and the Council's appraisal from an ecological perspective and prepared an Ecology Position Paper. A copy of the Paper is attached at Appendix H and the key issues highlighted below:
- The site falls within an impact zone for Thatcher's Wood and Westwood Covert Site of Special Scientific Interest (SSSI), with the SSSI itself located over 1km south of the proposed site. Within this impact zone, any development of more than 100 homes requires consultation with Natural England;
 - There is a new, non-designated habitat close to the site, which is managed by Shropshire Wildlife Trust which has been established under planning permission 12/04824/MAW Extension to Bridgwalton Quarry and restoration of land for a mix of uses comprising agricultural use, woodland, species rich conservation grassland and associated landscaping works incorporating new woodland planting together with the retention of the existing processing plant, silt lagoons, haul route and the erection of associated cement storage silo. The scheme is subject to a habitat management plan with an aftercare period covering the period for 2022-2026, that includes management of footpaths, etc. The potential impacts of the Tasley development need to be taken into account; and
 - Detailed species surveys need to be undertaken. However, it is understood that the site presents an abundance of suitable habitats for European Protected Species, principally bats and great crested newt.
- 4.8.2 EDP conclude that the Stanmore offers far fewer suitable habitats for European Protected Species than the Tasley Site.

4.9 Heritage

- 4.9.1 The Consortium's heritage consultant at EDP has reviewed the Heritage Assessment accompanying the Tasley submission and has carried out a comprehensive critique, which is set out below
- 4.9.2 The submitted Heritage Assessment has been completed without the benefit of site visits and has been written using photographs taken by the landscape architect as part of the LVIA and not the primary experience of the heritage expert. The focus of the LVIA is clearly different than that of any heritage assessment, thus the photographs within the LVIA are not necessarily appropriate for use within a heritage assessment and do not detail key views and features.
- 4.9.3 As such, the conclusions drawn by the Assessment cannot be considered robust and should be treated with caution. Indeed, it is the view of the Consortium that the allocation should be taken no further until a full and proper site visit can be undertaken to inform the assessment of potential harm upon heritage assets.
- 4.9.4 There are a number of technical deficiencies in the assessment. The map regression exercise undertaken in the assessment identifies the changing morphology but does not identify if and to what extent contemporary structures survive within the curtilage of both listed buildings. Such buildings would form part of the listing and therefore, this needs to be reviewed to establish if and to what extent additional buildings within these farm complexes may be curtilage listed.
- 4.9.5 As such, the number of listed structures may be far greater than suggested by the assessment, making the focus of any setting assessment too narrow and potentially therefore any conclusions drawn understated and misleading.
- 4.9.6 It is relevant to take into consideration that Morville Hall is a Grade I Listed Building. The hall, which is owned by the National Trust is situated close to the western boundary of the Tasley site, the potential impact on the setting of the Grade I Hall has not been considered in the Tasley submission.
- 4.9.7 The implications of these deficiencies translate to the assessment of the two listed buildings within the site, where there is little consideration of factors other than whether you can see the listed buildings from public rights of way and whether that is good or bad. This approach doesn't fully and properly assess the issues. The assessment does not properly acknowledge that the two listed buildings are set within agricultural land and that aspect of their setting, which is fundamental for farm buildings, would largely be eradicated by the development.
- 4.9.8 A more detailed assessment of the deficiencies of the assessment of the two listed buildings is set out in the Site Comparison: Heritage Matters document prepared by EDP, which is attached at Appendix I to this Report.
- 4.9.9 In this regard, paragraph 194 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. This is in contrast with the position at Stanmore where EDP find at worst, development could generate a very small degree of harm to the Scheduled Monument as a result of change in its setting. At Tasley, the site promoters state there is 'less than substantial harm' to the two Listed Buildings on site. As there is a 'strong presumption' against the harm to the listed buildings in law, and harm should be avoided and minimised where possible, before considering if there are public benefits that outweigh the harm, other sites where there is no or less harm must be considered. Stanmore would deliver comparable benefits and no harm is identified to heritage assets.

Critique of the Council’s Summary Assessment Paper

- 4.9.10 In its Summary of the Assessment of Garden Village Proposals in Bridgnorth (August 2020), the Council accepts the conclusion of the Tasley Heritage Assessment that there would be “less than substantial harm” to the two Grade II listed buildings from the development of the Tasley site and conclude that this harm can be outweighed by significant public benefits.
- 4.9.11 The Council’s assertion that the ‘less than substantial harm’ to the two listed buildings at Tasley can be outweighed by the significant public benefits of meeting the housing needs of Bridgnorth and its hinterland can only be flawed. Notwithstanding the fact that the harm arising in respect of the two listed buildings is not based on a full and proper assessment of the contribution made to their heritage significance by their farmland setting, the Council has missed an intermediate step in the assessment of that harm by failing to first identify and then assess the alternatives which could deliver the same benefits without resulting in the same degree of harm.
- 4.9.12 Here, the Council has treated ‘less than substantial harm’ to two listed buildings as if it was a desirable outcome, when really the legislation and planning policy is clear in highlighting that harm to heritage assets should be avoided where possible and minimised otherwise.
- 4.9.13 In choosing between two development proposals that would deliver the same public benefits, the one which results in least harm to heritage assets should be preferred. It is therefore clearly untenable for the Council to contend that there is ‘clear and convincing justification’ for the site at Tasley to moved forward for allocation and development if there is an alternative proposal on the table that could deliver the same benefits without causing the same degree of harm to the historic environment.

Heritage Conclusions

- 4.9.14 Given the above, the Consortium considers that the desk-based heritage assessment prepared by the promoter of the Tasley site is flawed and does not properly assess the potential harm to designated heritage assets within the allocation site. As such, there are serious questions over whether the proposed development could give rise to substantial harm to the significance of the heritage assets.
- 4.9.15 The flaws of this assessment are carried forward into the comparison carried out by the Council of the competing schemes at Tasley and Stanmore; and is compounded by a methodological flaw when considering the implications of harm to the listed buildings.
- 4.9.16 It is recommended that to fully inform the decision making process associated with the proposed allocation of Tasley Garden Village site for housing within the Shropshire Local Plan it must be subject to a more detailed and thorough assessment including a site visit by an experienced heritage consultant. This should focus particularly on setting matters within and beyond the site boundaries but should also pay particular attention to the assessment of the significance of the non-designated built heritage assets within the site including any contribution made by their settings in that respect.
- 4.9.17 It is also recommended that, following the re-assessment of the Tasley site, the Council re-runs the Sustainability Appraisal exercise as it relates to heritage matters, in order to compare and contrast the Garden Village site promotions again with full consideration for the heritage impacts of each proposal and with reference to heritage legislation and planning policy.

4.10 Morville and Bridgwalton Quarries

- 4.10.1 The impact on existing mineral assets needs to be considered. The Tasley proposal lies to the east of existing Morville Quarry and to the north of the Bridgwalton Quarry, both of which are sand and gravel quarries. It is also important to take into consideration that the land in between the existing quarry at Morville and the Tasley site has been allocated in the SAMDev as a Minerals Allocation (Policy MD5b). This allocation, which is immediately adjacent to the Tasley site, proposes an extension of Morville Quarry to ensure that Shropshire has an adequate and steady supply of sand and gravel during the Plan period.
- 4.10.2 On the basis that minerals can only be worked where they naturally occur, it is important that identified mineral assets are protected from non-mineral development. Approval of residential in close proximity to the existing quarries and the proposed allocated mineral assets is likely to prevent future extraction of the sand and gravel, which is of local and national importance. There has been no consideration of the impact of the Tasley scheme on these mineral assets.
- 4.10.3 There is currently a planning application to vary the original Planning consent for sand and gravel extraction at Bridgwalton Quay (12/04824/MAN), an application is being considered by Shropshire Council (20/01627/VAR) which seeks consent for an extension of Bridgwalton Quarry to release 80,000 tonnes of sand and gravel. The application site boundary lies close to the southern boundary of the Tasley Site. The potential impact of this on the Tasley Proposal has not been considered.

4.11 Summary

- 4.11.1 In light of the above, our client strongly considers that the proposal for the Tasley Site given its location will be incongruous with the surrounding uses. The allocation of the Site will have a detrimental impact on the local landscape and the local highway network which supports Bridgnorth's economy, not to mention the direct impact on the Livestock Market.
- 4.11.2 The Consortium have demonstrated that the employment proposed at Tasley is not a suitable location and would not be capable of being delivered; local property agents have strongly advised that the deliverability and viability of the proposed 16 hectares at Tasley is questionable in market terms. Based upon the evidence presented, it is considered that the employment element of the scheme would not be viable or deliverable.
- 4.11.3 An alternative site where the negative planning issues can be avoided and properly mitigated against should be considered. In light of the reasons above, our client does not consider that the Local Plan is sound in respect of Site Allocation BRD030. In particular, our client does not consider that the Site Allocation BRD030 is justified. Due to the lack of information regarding proposed Site Allocation BRD030 the Council have not demonstrated that the proposed policy has been weighed against the reasonable alternatives available to the Council nor are their conclusions based on proportionate evidence.
- 4.11.4 It is considered the Site Allocation at Tasley is not justified, therefore further consideration is given to the deliverability, availability and suitability of Site Allocation BRD030 so that the issues can be robustly assessed in a proper manner. It is considered that BRD030 should be deleted from Schedule S3.1(i), "Mixed Use Allocations: Bridgnorth Principal Centre". Stanmore Garden Community is the most sustainable option and should be allocated for development in the plan.

5 Stanmore Garden Community

5.1 Introduction

- 5.1.1 The alternative proposal, Stanmore Garden Community has been revised and should be reinstated as the preferred site. As set out above in the background leading to Stanmore, Shropshire Council were instrumental in identifying and approaching the landowners of the area east of Bridgnorth with a view to proposals for a garden community to deliver the housing and employment needs of the Bridgnorth area. They brought key parties together to introduce the idea.
- 5.1.2 Shropshire Council were committed to following the recommendation of the Inspector in the Report of the Examination of the SAMDev (2015) which found the Green Belt serves to constrain the growth potential of settlements in east Shropshire. It is considered to be clear instruction to the Council to review the Green Belt.

5.2 Amendments to the Stanmore Proposals

- 5.2.1 The Concept Masterplan Rev C August 2020 Appendix J provides a high level framework for development to ensure that the vision and concept can deliver the quantum of development required. It has evolved over time and continues to do so as new information or views become known. In August 2020 the site area (to be removed from the green belt) was greatly reduced although the proposal can still deliver the same quantity of development in the plan period.
- 5.2.2 Initially, the Council's Preferred Sites Consultation 2018 was based on the area of land required to accommodate the scale of development identified in their consultation Preferred Scale and Distribution of Development October 2017. The preferred site included an area of the Country Park and areas thought most appropriate for development having regard to constraints known at the time.
- 5.2.3 The proposal evolved in the period following the 2018 consultation and based on detailed analysis of the constraints and opportunities a Concept Master Plan 2019 was produced for a 3 day public exhibition. This responded to comments received and technical information gathered and a major change was removing the country park.
- 5.2.4 The proposal has continued to evolve to respond to local views, advice from Lord Matthew Taylor and further information gathered, to result in the Concept Masterplan Rev C August 2020 submitted with these representations (Appendix J). The key matters are:
- A reduced red line site area to 103 hectares
 - 37 hectares of green, blue and grey infrastructure
 - 66 hectares net development area
 - Exclude the Country Park from the site
 - Exclude Hermitage Ridge from the site
 - Exclude a 15m woodland buffer to Hermitage Ridge from the site
 - Revised site phasing to maximise access to the community centre early in the development

5.2.5 The proposal can deliver 850 houses, 16 hectares of employment and the community centre in the plan period 2016-2038. Beyond the plan period a further 650 houses can be delivered.

5.2.6 Hermitage Ridge and The Warren, the fields to the west of the ridge, provide an additional 22 hectares of green infrastructure that provide a network and linkage of spaces from the edge of Bridgnorth to the Country Park and beyond. Access through the ridge is on existing public rights of way and an additional link can be created on the cleared route below power lines.

5.3 Stanmore Design Principles

5.3.1 As set out in Section 5.8 above there are significant benefits of a long term vision for a new garden community with its own facilities offering a sustainable long term solution, consolidating and enhancing sustainability of an area of existing built development at Stanmore Business Park, the Country Park, The Hobbins and Russells Close. There is already a cluster of development and urbanising uses at Stanmore to provide the focus. Moreover, the scope to provide a real (and viable) community centre is enhanced by the existence of significant demand from present housing and the 1,700 employees at the Business Park as well as new residents. The new community will be designed to Garden Village Principles.

5.3.2 It will provide:

- a range of housing to meet local needs, particularly for affordable housing at 30% and potentially for 'key workers';
- new employment areas on land within the proposed community and as an extension to Stanmore Business Park thereby providing much needed expansion space and extending employment opportunities in the town;
- Long term stewardship of the village and community;
- High quality placemaking led design to suit the context;
- Delivery of a low carbon development with net zero carbon operational buildings that deliver an exemplar approach to addressing our climate emergency
- A significant net gain in the quantity, quality, connectivity and biodiversity of public open space;
- A significant improvement to access to extensive recreational open space and the countryside for existing and future residents; and
- a new area of publicly accessible open space to include Hermitage Ridge providing:
 - informal but managed footpaths creating functional and recreational linkages between Low Town and the country park;
 - interpretation boards on the woodland and ecological features;
 - protection as required to ancient woodland and
 - interpretation boards on The Hermitage caves scheduled monument.

5.3.2 The proposed site is tied to the location by the existing core of uses and as the land- owner will deliver it, there is no land to buy and hence more flexibility in the type and tenure of housing and the facilities that will be provided to support it. As an Estate, Apley have a long term interest in the community and a strong desire to take a long term interest in delivering the proposed garden community. This provides a basis for the delivery of an exemplary new community

5.4 Green Belt

Purposes of the Green Belt

- 5.4.1 The justification for review comes from the Report of the Examination of the SAMDev 2015 where the Inspector recognised the need to open up new areas to accommodate the long term future of the town. The reasoning in paragraph 189 and 190 of the Inspectors Report being:

"Bridgnorth is the second largest of 5 market towns in Shropshire and is located on the western edge of the West Midland conurbation. It therefore offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets. The eastern side of Bridgnorth is tightly constrained by the West Midlands Green Belt. This has greatly limited the options available to the town in the SAMDev Plan. The CS emphasises Bridgnorth's role as a focal point which contrasts with strongly felt local views of a historic town that should be preserved at its current size. Most of the opportunities in and around Bridgnorth for infill development and small additions to the town have been used up. To accommodate the long term future of the town it is necessary to open up new areas. The provision of good quality employment land will provide a long term benefit by improving the range and choice of investment options in this location."

- 5.4.2 The Shropshire Green Belt Assessment (2017) and the Shropshire Green Belt Stage 2 Assessment (2018) provide the evidence base of the Council. The 2017 Assessment states the overall aim is to provide Shropshire Council with an objective; evidence based; and independent assessment of how the Shropshire Green Belt contributes to the five Green Belt purposes, as set out in national policy. It assesses the relative performance of the Green Belt; not what adjustments should be made to it. The five purposes of NPPF paragraph 134 being:

1. To check the unrestricted sprawl of large built up area
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 5.4.3 The 2017 Assessment concludes the parcels of land that include the site as now promoted – Parcels part P54, P56, P57 and P58 – make no contribution or a weak performance against Purpose 1, 2 and 4 of the NPPF GB purposes. It assesses P56 and P57 as making a 'strong' contribution to Purpose 3 and P54 and P58 as making a 'moderate' contribution to Purpose 3 of the NPPF.

- 5.4.4 The Consortiums consultant EDP have considered this from a landscape view. They find the methodology used for the Council's evidence base falls short of a thorough testing of Purpose 3 (Appendix B). Following a review of this evidence base, EDP have concluded that the depth of testing is too limited, and the considerations are not sufficient to examine overall performance against all five Green Belt purposes. Their findings are set out in the Green Belt Position Note that accompanies this representation.

- 5.4.5 EDP undertook their own assessment. In respect of Purpose 3, they find sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains

features that are in poorer condition. This allows a relative and qualitative ‘value’ element to be applied to landscapes.

- 5.4.6 Furthermore, they find the matter of ‘encroachment’ is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, substations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 5.4.7 Applying this to the site they conclude that, given the size of the site in reality, the function of the site relative to Green Belt Purpose 3 actually diminishes in certain areas due to the effect of limited representation of key characteristics of the countryside, urbanising features and recreational access to the wider Green Belt, however, EDP considers that overall the site makes a ‘moderate’ contribution to Green Belt Purpose 3, not a ‘strong’ contribution. Furthermore, of key note is that the site can readily provide defensible, durable boundaries to the west, south, east and through delivery of Public Open Space and new planting, could reinforce the defensible boundary and buffer to land separating this proposed development from the wider Green Belt to the east. These factors ensure that the site is an isolated parcel of Land with functioning Green Belt buffers.
- 5.4.8 EDP finds that the overall site performs poorly (weak) against all the NPPF’s Green Belt purposes (relative to GB Purpose 1, 2, 4 and 5 with Purpose 3 scoring moderately rather than strongly) and makes a limited contribution to the fundamental purpose of Green Belt, which is to keep land between settlements permanently open. As such, when coupled with the need to deliver new housing growth at the most sustainable locations in the district it should be considered for release from the Green Belt as part of the Local Plan partial review process. Overall, EDP find the impact on the purposes of Green Belt makes Stanmore Garden Community a suitable site to remove.
- 5.4.9 The Council’s Stage 2 Assessment 2018 looks at specific opportunity sites based on the level of harm and the image below shows the conclusion of the level of harm from the release of parcels surrounding Bridgnorth.

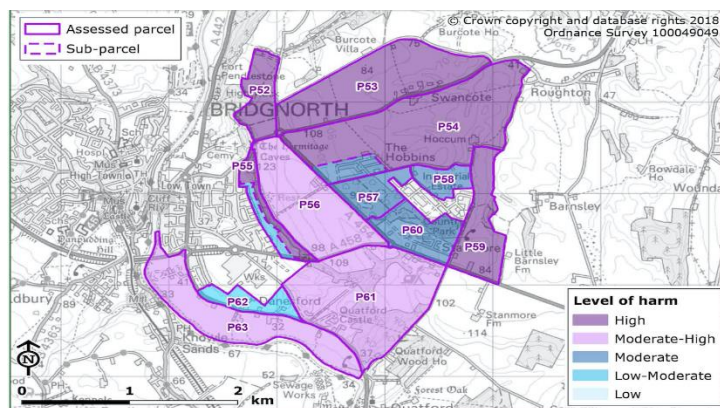


Image - Level of harm from the release of parcels surrounding Bridgnorth. Shropshire Green Belt Stage 2 Assessment (2018)

- 5.4.10 Notably, the site area has changed and all but a small part of P54 is removed. P54 shows a high level of harm if it were to be released in full.

Exceptional Circumstances

- 5.4.11 Green Belt exceptional circumstances are considered to exist to justify changes to the Green Belt boundaries to allocate the Stanmore Garden Community. A separate report by Stansgate Planning July 2020 that includes an opinion from leading Counsel Christopher Young QC (Appendix L), provides a legal interpretation of what exceptional circumstances means and how it can be applied at Stanmore. In the case of Stanmore, there are a number of matters that cumulatively amount to exceptional circumstances.
- 5.4.12 Furthermore, Shropshire Council has now published a Green Belt Exceptional Circumstances Statement August 2020 as part of the evidence base of the LPR. In respect of Bridgnorth, this demonstrates that exceptional circumstances exist for release of Proposed Sites P58a and STC002 in Policy S3.1 of the Draft Local Plan. Site assessments for P58a and STC002 confirm they are suitable, available, achievable and viable subject to exceptional circumstances. All other reasonable alternatives to expansion at Stanmore and for expansion at Stanmore, are assessed and it is concluded their removal from Green Belt is justified by:
- Supporting the role of Stanmore Industrial Estate;
 - Supporting the medium and long-term needs of existing businesses;
 - Attracting new businesses, particularly those in the ‘engineering and advanced manufacturing’ sector;
 - Supporting the strategic role of Bridgnorth;
 - Supporting the aspirations of the Economic Growth Strategy for Shropshire;
 - Provision of market and affordable housing in a sustainable location
- 5.4.13 Notably, the Statement in respect of Bridgnorth is absent on the how the location impacts on access and facilities for employees at Stanmore, at both proposed and existing businesses. The existing businesses see a high level of in-commuting of lower paid workers due to lack of housing affordability – and conversely out-commuting by the higher paid workers and this is a trend generally in Bridgnorth. There is a commitment in the Local Plan to reverse the trend which is evidenced by the stated aim and objective of the Local Plan to rebalance the employment and housing needs of the town.
- 5.4.14 Based on the principle of connecting housing provision with employment, the location of a substantial number of houses in close proximity to the Business Park (and town) should assist in increasing the availability of employees to Bridgnorth companies and would reduce the number of in-commuters. The possibility of linking certain types of ‘key worker’ to qualification for affordable housing has also been offered by the promoters of Stanmore Community.
- 5.4.15 The availability of a Local Centre (with convenience store) in the Stanmore Community development and potential diversion (and greater frequency of) bus services through the Business Park as a result of the new community will help reduce travel by private motor car.
- 5.4.16 New housing and new facilities at Stanmore Community would be within easy walking or cycling distance of the Business Park and would enhance the sustainability of the existing businesses, as well as those proposed.
- 5.4.17 As a result, the Council’s exceptional circumstances case is narrow and misses a wider opportunity to deliver a sustainable inclusive new community. The exceptional circumstances can apply equally to the new garden village.

5.5 Availability and Deliverability of the Site

- 5.5.1 Two landowners control the majority of the land needed to deliver the garden community and a third owns a minor area to the east of the Business Park. The two active parties, Apley Estate and Stanmore Properties together with John Davies Farms comprise Stanmore Consortium. They have a consortium agreement that deals with delivery of the complete new community to include mixed uses and infrastructure. Apley and Stanmore intend to deliver the proposals themselves.
- 5.5.2 The likelihood of development coming forward is a key consideration in identifying sites. Stanmore is suitable, available and achievable. It is therefore deliverable.
- 5.5.3 Shropshire Council's 3 stage site assessment contained in the SLAA 2018 (Stage 1) and the Site Assessments: Bridgnorth Place Plan Area November 2018 (Stages 2 and 3) assessed the site as identified in the Council's Preferred Sites Consultation Plan 2018. It is covered by site references P54, P56, STC002, STC005, P58a. A further study, Strategic Sites Assessment 2019 repeated Stage 2 but referenced Stage 3 assessments of sites such as Stanmore back to that of November 2018. Therefore, Stage 3 site assessment for Stanmore is found in Site Assessments: Bridgnorth Place Plan Area November 2018.
- 5.5.4 High level Stage 1 and 2 assessments found all sites were considered available, achievable and viable, but not suitable. In assessing suitability, matters of Green Belt, separation from Bridgnorth, relationship with Scheduled Monument and listed buildings, proximity to ancient woodland, were raised.
- 5.5.5 Stage 3 assessment, a much more detailed study looking at technical matters in more depth and strategic considerations made recommendations on whether sites should be allocated, it concluded that all sites (P54, P56, P58a, STC002, STC005) be recommended for allocation (Appendix U – Shropshire Council Extract Site Assessments: Bridgnorth Place Plan Area November 2018 Stage 3).
- 5.5.6 The site as now proposed by the Stanmore Consortium includes the same parcels of land assessed except it now includes only the eastern part of P54, not the whole.

Suitability of the Site

- 5.5.7 The technical evidence addresses the constraints and opportunities to confirm the suitability of the site and Stage 3 site assessment as referred to above confirms this.

Availability of the Site

- 5.5.8 The site is available immediately. It is promoted by the landowners who have a consortium agreement that deals with delivery of the complete new community to include mixed uses and infrastructure.
- 5.5.9 There are no legal or ownership impediments to development. As set out above in respect of landownership, two landowners control the majority of the land needed to deliver the garden community and a third owns a minor area to the east of the Business Park. All the land necessary for delivery is included in the agreement and is available.

Achievability of the Site

- 5.5.10 To be achievable, there has to be a reasonable prospect that the development will be developed at a particular point in time. The proposal has been carefully considered and prepared with expert advice from relevant disciplines and has evolved to present a garden community that can realistically be delivered.

- 5.5.11 The site is economically viable. The proposal is aspirational with a high level of affordable and specialist housing; community facilities; green infrastructure and long term stewardship which can be achieved because the land is already owned and does not need to be acquired at an open market land value that presents a cost to the delivery.
- 5.5.12 It is also necessary that the landowners are committed together to bring forward the profit and non-profit making elements of the proposals to deliver the entire village. An agreement is in place with the parties that provides for values to be equalised across the mixed uses and necessary infrastructure so there is no doubt the Stanmore Garden Community can be delivered as a complete entity with the aspirational elements that will make it a community.
- 5.5.13 The long term stewardship will be vested in the Apley Estate as a legacy landowner and Stanmore Properties in respect of the Business Park.
- 5.5.14 The SAMDev Plan Inspector recognised the need to open up new areas to accommodate the long term future of the town.

Delivery Strategy and Phasing

- 5.5.15 The proposed delivery strategy and phasing is set out in the Consortiums report Stanmore Community Phasing (Appendix V) prepared by the Consortium and its advisors, including Lord Taylor bringing his advice from the governments Garden Communities programme and experience at Nansleden in Cornwall.
- 5.5.16 The delivery strategy is comprehensive in respect to phasing; the method of delivery; design quality and control; and management and stewardship.
- 5.5.17 For the success of the village as a new community, the local centre including the refurbished Hermitage Farmhouse and associated farm outbuildings into a community facility with shops for local retailers and a cafe, are to be provided in the first phase.

5.6 Transportation

- 5.6.1 On behalf of the Consortium, PJA have prepared a High Level Transport Appraisal March 2020 (Appendix D) based on 850 dwellings, 16ha (approximately 68,000sqm of buildings) a local centre and associated green infrastructure. From traffic counts, published data, extensive observation and computer modelling, PJA have calculated existing capacities for 8 main highway junctions and considered the impact of development. Recommendations are that more detailed junction modelling is needed for at least 2 of the junctions at a planning application stage. Overall, with mitigation it is considered that there is no constraint to development.
- 5.6.2 The A454 provides ample opportunity to facilitate vehicular access(es) into the site. Through the development of the site, the character and function of this section of the A454 will naturally change. There will be a need to introduce features and facilities to slow speeds, reduce severance between the parts of the development either side of the A454 and enable walking and cycling connections. The primary function of the A454 will not change. The community centre can have direct access to it where traffic speed will be calmed to 20mph.
- 5.6.3 A 'Park and Choose' facility is proposed in the community centre as explained in the PJA report. It would include the following provision:
- Cycle parking and Cycle hire facilities;

- Pool cars for hire;
- Electric bike/scooter hire; and
- High quality bus service into Bridgnorth with existing bus routes serving the facility and enhanced frequencies.

5.6.4 Linkages will be provided through the residential areas and will cross Hermitage Ridge at two points. One is where power cables pass through the woodland where it is cleared under a management agreement every 3 years. The other is where a PROW exists. These routes will provide direct, traffic free access at gradients acceptable in highway standards to employment areas to the south west and Low Town. Additionally, it should be possible to improve and widen existing footways to Wolverhampton and Stourbridge Roads (north and south of the site. All the land required is owned by Apley Estate. The routes are shown on the Concept Masterplan Rev C August 2020 (Appendix J).

5.6.5 An illustration of how the connection through Woodland on Heritage Ridge could work is in Appendix M. Also see PJA Technical Note response to SC key considerations (Highways) September 2020 (Appendix E).

5.6.6 The consortium's ecologist at EDP has made the following comments in respect of a route in the clearing:

- EDP has undertaken site visits to Hermitage Ridge on 04 and 08 July 2019 as part of the arboricultural surveys and are broadly aware of the features mentioned by PJA. In order to satisfy the NPPF guidance, EDP will need to undertake more detailed survey work going forward and this work would be supported by a full topographic survey of the proposed route.
- There are already a number of informal footpaths through the woodland. There is the possibility of using pathways raised on stilts/boardwalk and this would minimise adverse impact on soil and tree roots while potentially confining walkers to the actual route of the path and naturally limit foot traffic on informal routes and by virtue limit further damage to the Ancient Woodland. In conjunction with this formal access EDP propose the woodland is fenced along the defined 15m buffer to further limit informal access and enable planting of native woodland as part of biodiversity offsetting.
- A proposed path at DDA compliant gradients, using the existing cleared route under the power lines would (subject to survey) have minimal impact on trees or the ancient woodland generally. If any areas were discovered to be of heightened sensitivity sections of raised path would greatly reduce any impact.
- Western Power Distribution clear the area under the overhead lines every 3 years cutting back trees and bushes – this creates a ‘bare corridor’. *
- It is our view, that the provision of this formal access route would greatly enhance the woodland and ensure the woodland’s sustainability by protecting it from existing and potentially increased footfall.

5.7 Employment

5.7.1 The growth strategy for employment is driving the need. Such need is evidenced by socio-economic statistics in the reports prepared for the Consortium by Hatch-Regeneris (Appendix A) and MacMullen Associates (Appendix S) (submitted to the Council March 2020 in the Vision document Appendices A1 and A2) and is reflected in the additional employment land proposed to recognise the considerable potential of Bridgnorth

to attract inward investment and the market signals that existing businesses need to grow. The development of the existing employment base within the Town particularly that to the east is identified by Hatch Regeneris as having the potential to grow and expand further. The ONS data in the Hatch report clearly underpins the success of Stanmore and supports the opportunity for inward investment. The ONS data suggests that employment in Bridgnorth (including Stanmore) increased in the period 2013-2017 by 1,100 jobs, 350 of which were at Stanmore. At 20% this growth compares with +7% (Shropshire) +9% (Telford) and a fall of 9% in Wolverhampton. The Stanmore Business Park is therefore a key driver of the need for development. It has been running at 97% capacity and is reported to be turning away enquiries due to lack of available space.

- 5.7.2 Locating growth where the need arises means around Stanmore Business Park and should be the clear focus for a new quarter for the town where new jobs will be created and is the commercial developer preference as set out in Unmet Need above. Furthermore, Stanmore is far better located to reach major areas of employment in the conurbation and other employment areas of Bridgnorth, than alternative sites around Bridgnorth outside of Green Belt. This is demonstrated in the survey responses received and reported in MacMullen Associates report (submitted to the Council March 2020 in the Vision document Appendix A2).
- 5.7.3 The need is clearly best met in the specific location of Stanmore.

5.8 Landscape and Visual Impact

- 5.8.1 On behalf of the Consortium, EDP have carried out a Landscape and Visual Appraisal (LVA) (Appendix N) and Arboricultural Appraisal (Appendix T) of the site based on the revised site area. It finds the site itself is inherently visually and physically well contained in most areas due to a combination of undulating local topography and mature vegetation, with built form adjacent the site to the east at Stanmore Industrial Estate and bounding the site at The Hobbins residential development. The site is further contained by the local road network, with the A458 forming the site's southern boundary and the A454 and Wolverhampton Road forming the northern boundary. Hermitage Hill on the western boundary forms a local ridgeline which extends on a north-south axis along the eastern edge of Bridgnorth, providing screening for both the site and the settlement in local views.
- 5.8.2 The site itself comprises rectilinear, medium to large scale agricultural fields. As set out within the published landscape character assessments, and further illustrated within the supporting imagery in the LVA a combination of local topography and mature tree cover result in limited views of the site from the north, west and south. The site benefits from the containment offered by Hermitage Hill Coppice to the west, Stanmore Country Park to the east and other surrounding woodland plantations to the north, south and further east, in addition to well established field boundaries that offer the basis for further reinforcement. However, where ground rises to the east, at High Grosvenor, glimpsed views are experienced by users of a rural land, although this is limited to occasional stretch of public footpath on the most elevated ground and where breaks in field boundary vegetation occur.
- 5.8.3 Views back to the site from publicly accessible locations are very limited by mature vegetation and tree cover within the local context. From a sensory perspective, the site is consistent with its surrounding context, being relatively unremarkable within the landscape, although Hermitage Hill Coppice the most visually sensitive part of the site and can be seen in elevated views from the east as providing some contribution to the wooded context. The Stanmore Industrial Estate and land adjacent to The Hobbins is well screened by the intervening landform, woodland and field boundary vegetation, partly owing to the lower lying ground and the proximity of Stanmore Country Park.

- 5.8.4 The site is bounded on all sides by mature vegetation, the more dense being the western boundary aligned with Hermitage Hill and eastern boundary comprising Stanmore Country Park. While the southern boundary is defined by the A458, mature woodland to the south contains views from the road and wraps around Stanmore Hall and the Touring Park.
- 5.8.5 The site does not form a prominent or important part of the appreciation of the wider landscape and is seen as having limited interest, being barely perceptible in many views from within the wider surrounding context. Views of it are generally only perceived by receptors passing along the local road network and from public footpaths through and in close proximity to the site.
- 5.8.6 The proposals will result in some change and effect to receptors within a very close range (which is inevitable for any greenfield development location), but this change will be experienced within a location where residential and industrial development has desensitised these receptors, and a main road network provides some urbanised features contributing to an ‘urban fringe’ context which appreciably affects the baseline and thus level of effect.

5.9 Ecology and Biodiversity

- 5.9.1 On behalf of the Consortium, EDP have prepared an Ecology Technical Note (Appendix O). The desk study and Extended Phase 1 Habitat survey has confirmed there are no statutory or non-statutory designations on the site. It identified the following valuable ecological features within/adjacent to the Site:
- Directly adjacent area of ancient woodland (Hermitage Hill Coppice);
 - Stanmore Country Park which lies directly adjacent to the Site;
 - Plantation/broadleaved woodland, scrub and semi-improved grassland, hedgerows and mature trees within the Site;
 - Potential for foraging badgers within and adjacent to the Site;
 - Potential for bats foraging and roosting within and adjacent to the Site; and
 - Potential for breeding birds, reptiles and great crested newt to be present (presence to be confirmed by further survey work).
- 5.9.2 There are no obvious ‘in principle’ (significant) ecological constraints that would preclude development, and which cannot be avoided by good design. Moreover, EDP considers that the Site presents an opportunity to deliver a net gain to local biodiversity, ensuring local and national policy compliance.

5.10 Agricultural Land Quality

- 5.10.1 On behalf of the Consortium, EDP have provided advice (Appendix P). The DEFRA Post 1988 Agricultural Land Classification (England) shows broad classifications for land around Bridgnorth but does not specifically include the land forming the Garden Community site. Natural England publishes a very large scale data set which indicates broad classifications at Grade 3 and possibly some Grade 2 around Stanmore.
- 5.10.2 The majority of the proposed ‘community’ land is held by the Apley Estate and farmed ‘in-hand’. Apley’s Land Agent observes that the land, while reasonably fertile, is formed on sandstone and, being sandy, dries out very

quickly in the absence of rain. Typically, this would infer a classification of 3(a) or 3(b) is likely to be established if a fuller sampling survey is undertaken.

- 5.10.3 The same maps show other areas around Bridgnorth to be Grade 2 including land at Tasley south of the A458 which has been subjected to a sampling survey.
- 5.10.4 The Apley land included in the ‘community’ proposal forms part of the Estate’s ‘in-hand’ holding and its loss to development would not be prejudicial to the agricultural viability of the remaining holding. Some land lying to the North and East of Stanmore Business Park proposed to be designated for Employment use is part of the former RAF station and has not been in agricultural use since about 1939.

5.11 Heritage

- 5.11.1 On behalf of the Consortium, EDP have prepared an Archaeological and Heritage Assessment of Stanmore (Appendix Q) and a Briefing Note that is a comparison between the Tasley Garden Village and Stanmore (Appendix I), that discusses the legislative context and how the sites compare with the conclusion that the Council has misinterpreted the concept of ‘less than substantial harm’ in terms of government guidance.
- 5.11.2 It finds at Stanmore there is part of one designated heritage asset (as defined in Annex 2 of the NPPF) within the Site. This is The Hermitage scheduled monument (1004782), located in the far north western corner of the Site. The above ground remains of The Hermitage are well contained within Hermitage Hill Coppice, which is also designated as ancient woodland. The arable fields with-in the Site are concluded to be a neutral element of the setting of the asset and make no contribution to its significance one way or the other. It should not impede the sites allocation. Indeed, the development presents an opportunity to improve the conservation and presentation of the monument through improved management, which could be secured by condition or S106 obligation. Accordingly, it is reasonable to conclude that development of the site would at least cause no harm to the significance of the monument and could in fact potentially deliver an enhancement.
- 5.11.3 There are no other designated heritage assets in the Site at Stanmore. Some potential for archaeological remains has been identified within the Site which can be investigated as part of a planning application.
- 5.11.4 In comparing the two sites at Tasley and Stanmore, attention is drawn to the legislative context concerning the treatment of scheduled monuments and listed buildings. The Ancient Monuments and Archaeological Areas Act 1979 (HMSO, 1979) does not confer any statutory protection on the setting of a scheduled monument, although this is still considered as a policy matter in Paragraph 194 (and elsewhere) of the National Planning Policy Framework (NPPF).
- 5.11.5 S66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 set out the duties of a Local Planning Authority (LPA) in respect of the treatment of listed buildings and conservation areas through the planning process. The two set out the statutory duties of the decision maker, where proposed development would affect a listed building or its setting or the character or appearance of a conservation area.
- 5.11.6 The ‘special regard’ duty of the 1990 Act has been tested in the Courts and confirmed to require that ‘considerable importance and weight’ is afforded by the decision maker to the desirability of preserving a listed building and its setting or the character or appearance of a conservation area. There is a ‘strong presumption’ against the approval of development proposals that would harm the setting of a listed building.

In comparison, the Ancient Monuments and Archaeological Areas Act 1979 focuses solely on the conservation of a monument's form and fabric

- 5.11.7 There is therefore a key difference between the statutory protection afforded to the setting of a scheduled monument as compared to a listed building. This is an important distinction because it means that the setting of a listed building receives statutory protection, whereas the setting of a scheduled monument is a matter of planning policy only and not covered by the relevant Act of Parliament.
- 5.11.8 At Stanmore, EDP find at worst, development could generate a very small degree of harm to the Scheduled Monument as a result of change in its setting. At Tasley, the site promoters state there is 'less than substantial harm' to the two Listed Buildings on site. As there is a 'strong presumption' against the harm to the listed buildings in law, and harm should be avoided and minimised where possible, before considering if there are public benefits that outweigh the harm, other sites where there is no or less harm must be considered. Stanmore would deliver comparable benefits and no harm is identified to heritage assets.

5.12 Suitability Summary

- 5.12.1 In summary, the site is relatively unconstrained with the only statutory designations on site being Green Belt and part of a Scheduled Monument. Ancient Woodland is adjacent to the site and the required buffer is respected. The reduction in the site area reduces impact on all matters as there is less land affected, lower landscape impact due to the more contained area, less Green Belt to release and of that to be released now includes only a small part of the area of high harm (P54). The Scheduled monument is not physically affected and the impact on the setting considered neutral.

6 Public Consultation

- 6.1.1 A summary of the consultation and engagement regarding the Bridgnorth Garden Community proposals has been prepared by Camargue on behalf of Stanmore Consortium this includes community engagement from September 2019 to September 2020. (Appendix W). It also considers the wider engagement on the Garden Community proposal within Bridgnorth.
- 6.1.2 The Consultation Programme has ensured proactive and ongoing engagement with key stakeholders and members of the community, with regard to the Consortium's proposals at Stanmore the following has been undertaken:-
- Engagement with the Local MP and local elected members.
 - Public exhibitions (3 days)
 - Engagement with local residents and business stakeholders at the public exhibitions.
 - Responding to queries from residents and requests for further information.
- 6.1.3 The Consortium has, throughout the Local Plan Review process sought to maximise the awareness of its proposals in order to engage with as many local residents as possible; this was achieved through.
- Invitational flyer
 - Media advertising
 - Project website
 - Regular editorial in local media
- 6.1.4 Following the exhibition, the Consortium continued to engage with stakeholders and the wider community on the changes to the scheme, this has included:-
- Presentation and meetings with Council Officers
 - Presentation to Shropshire Council Cabinet members
 - Briefing with Local Shropshire Councillors
 - Presentation to Bridgnorth Town Council
 - Project updates to Presentation and update briefings including members for Worfield, Brown Clee, Much Wenlock, Bridgnorth West & Tasley, Bridgnorth East & Astley Abbots, and Chirbury & Worthen
 - Project updates and information to Morville Parish Council, Tasley Parish Council and Worfield Parish Council
- 6.1.5 During this period Apley Estate has also presented proposals for Stanmore to the following organisations:
- Marches Local Enterprise Partnership

- Shropshire Wildlife Trust
- The Woodland Trust
- CPRE Shropshire
- Sporting Bridgnorth
- Bridgnorth Sustainability Forum
- Country Land & Business Association
- Buglife
- Forestry Commission / Forest England

6.1.6 In responding to Shropshire Council’s Local Plan Review, Bridgnorth Town Council during its Extraordinary meeting of 9th June 2020 agreed that Stanmore Garden Community site is its preferred site. The Stanmore Consortium was not present at this meeting.

6.1 Tasley Proposal

6.1.1 The level and detail of consultation undertaken by the consortium is in complete contrast to the consultation undertaken by the promoters of Tasley Garden Village.

6.1.2 The Tasley public consultation was inadequate and fell well below the standards required in Shropshire’s Statement of Community Involvement.

6.1.3 It was organised at the last-minute and lacked any meaningful information for local community scrutiny. It provided no proper opportunities for the community to engage and challenge the proposals and most people were unaware of it due to negligible publicity.

6.1.4 The short consultation period and lack of promotion meant that local people opposed to the scheme did not have time to organise a response to it.

6.1.5 A webinar was organised right at the end of the short consultation exercise – seven days before it ended.

6.1.6 There was no opportunity for conversation or discussion during the webinar.

6.1.7 All questions on key issues such as education, traffic, pedestrian access, housing type, ecology and flood risk were deferred to a stock response that “Will be considered as part of Shropshire’s Local Plan Review process”.

6.1.8 The developer said that there were 42 people at the webinar - a very low number, due to the timing (in the middle of the working day).

6.1.9 Some people including the former Mayor of Bridgnorth complained that they were denied access.

6.1.10 All the questions were removed immediately after the webinar and not posted on the website. Nearly 48 hours after the event there was still no reference to them

- 6.1.11 It is also important to take into consideration that Bridgnorth Town Council during its Extraordinary meeting of 9th June 2020 unanimously voted not to support the Tasley Site.

7 Review of Shropshire Assessment of Garden Village Proposals

7.1 Introduction

- 7.1.1 This response addresses the supporting evidence that underpins site selection in Bridgnorth and relates to the Regulation 18 Consultation Policy 3.1. Development Strategy: Bridgnorth Principal centre. The supporting evidence is the **Summary of the Assessment of Garden Village Proposals in Bridgnorth**.
- 7.1.2 The Summary is a comparison of the Tasley Garden Village and Stanmore Garden Community that underpins the selection of Tasley Garden Village as the Preferred Site in the Pre Submission Draft August 2020.
- 7.1.3 Our clients disagree with the assessment which is misleading and has in any event moved on as the Stanmore site is reduced in size. Using the headings in the assessment, key considerations are:

7.2 Agricultural Land Quality

- 7.2.1 There is nothing in the evidence base of the LPR that identifies the ALQ to allow a suitable comparison to be made and without evidence it is misleading to say Stanmore is Grade 2 and Tasley Grade 3.
- 7.2.2 The assessment is understood to be based on maps produced by Natural England that pre date MAFF Agricultural Land Classification of 1988 that subdivide Grade 3 into 3a and 3b, where only 3a is best and most versatile. Such maps are expressly stated in Natural England's Technical Information Note 049 (TIN049), to provide general strategic guidance on agricultural land quality for planners. It warns:

“These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance.”

- 7.2.3 Further information is contained the Consortium's note Agricultural Land Quality by EDP.
- 7.2.4 In the absence of detailed information, it is not possible to distinguish what the impact of either site is on best and most versatile land.

7.3 Flood Risk

- 7.3.1 The aim of the sequential test carried out at plan making stage in a Strategic Flood Risk Assessment, is to steer new development to areas at lowest risk of flooding. Development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding. If it's not possible for development to be located in zones at lower risk, the exception test may be applied (NPPF 158-159).
- 7.3.2 Stanmore is located entirely within flood zone 1 so is considered to be at low risk of flooding. It is sequentially acceptable and preferable for residential development. The vulnerability to other sources of flooding show the site is at very low risk of flooding.

7.3.3 Tasley is primarily flood zone 1 but has areas in flood zones 2 and 3 (high risk of flooding). Sequentially, development should be directed to Stanmore as it is possible for development to be located in a lower risk zone. At Tasley, the vulnerability to other sources of flooding shows it also has small areas in within the 1 in 30 year, 1 in 100 year and 1 in 1,000 year surface water flood risk zones.

7.3.4 Stanmore is sequentially preferred.

7.4 Water Quality

7.4.1 Source Protection Zones are shown in the Shropshire Council Water Cycle Study July 2020 and Stanmore Preferred Employment Site P58a falls in the outer catchment zone.

7.4.2 The Stanmore Garden Community site has been reduced in size and the land previously in the outer catchment zone is no longer part of the site. Save for the Preferred Site P58a, Stanmore is not within a source protection zone.

7.4.3 Tasley is not within a source Protection Zone.

7.5 Green Belt

7.5.1 Stanmore is located within the Green Belt. Overall, the Stanmore contribution to Green Belt purposes is weak to moderate. The harm if removed is primarily moderate-high. Exceptional circumstances are demonstrated and Green Belt should not be a constraint to site selection. The level of harm was known when Stanmore was identified in the Preferred Sites Consultation 2018.

7.5.2 Tasley is not in the Green Belt.

7.6 Landscape & Visual Sensitivity

7.6.1 The Stanmore site falls entirely within Parcel 02BDG-E of the published Shropshire Landscape and Visual Sensitivity Assessment which concludes that the site has a medium landscape and visual sensitivity to residential and employment development. The Council's Development Options Assessment states that "A very small portion of the eastern extent of the site has medium-high landscape and visual sensitivity to housing and high landscape and visual sensitivity to employment". It is unclear which area this is referring to, as the Stanmore site falls entirely within Parcel 02BDG-E.

7.6.2 The Tasley site will be highly visible, being located on elevated, facing slopes over a substantial area to the west of Bridgnorth. Development will be large scale and comprise a notable extension to the built development of Bridgnorth. The open nature of the site, in comparison to the Stanmore, in relation to views from the local PRow means that the site will form an intrusive element in the landscape to the south-west of the settlement leading to a greater visual impact. The Tasley site is assessed to have a medium sensitivity to residential development and a medium-high sensitivity to employment development.

7.6.3 To conclude, the Tasley site has a higher sensitivity to employment development (medium-high) than the Stanmore site and a small part of the site has not been assessed. The Stanmore site clearly scores more

positively on landscape sensitivity than the Tasley site in its suitability for residential development. It is considered that the Tasley proposal, given the nature of the site, would have a far greater impact in terms of Landscape and Visual Impact than Stanmore.

7.7 Ecology

- 7.7.1 NPPF directs local authorities where possible to allocate land of low environmental value.
- 7.7.2 Stanmore has no statutory designations on site. Alongside Stanmore, the Ancient Woodland on Hermitage Ridge is appropriately buffered by at least 15m to meet Natural England standards. The site is within the potential zone of influence of two SSSI's but no direct hydrological or connectivity is found between the sites and no potential impact is identified. There are four non-statutory Local Wildlife Sites within 2km of the site.
- 7.7.3 Tasley has no statutory designations on site. It is within the impact risk zone of four SSSI's where two present potential indirect hydrological impact as a result of pollution from the development entering Tiddle Brook. There are three non-statutory wildlife sites within 2km and an abundance of suitable habitats for European Protected Species, principally bats and Great Crested Newts. There are 6 ponds within the site boundary and a further 8 within the 500m survey distance.
- 7.7.4 Both sites need detailed survey but Tasley appears more sensitive.

7.8 Heritage

- 7.8.1 The land at the 'Garden Community' at Stanmore includes part of the designated area of the Scheduled Monument of The Hermitage. The details described in the scheduling citation indicate that all known archaeological remains related to the monument comprise caves and their entrances. There are no known above ground remains within the Site, with the entrances within Hermitage Hill Coppice located beyond the Site boundary to the west.
- 7.8.2 The above-ground remains of The Hermitage are therefore well contained within Hermitage Hill Coppice, which is also designated as ancient woodland. The arable fields within the Site are concluded to be a neutral element of the setting of the asset and make no contribution to its significance one way or the other. Hence, whilst further assessment will be required of emerging development proposals, it is considered that development within the Site could easily be accommodated without causing harm to the heritage significance of The Hermitage scheduled monument. Indeed, there is no reason to believe that the Site could not come forward in a way that would either preserve or actively enhance the significance of this Scheduled Monument, as it is within the applicant's control and could hence be subject to improved management and presentation through the development.
- 7.8.3 Some potential for archaeological remains has been identified within the Site. Notably, cropmarks suggesting the presence of possible Iron Age or Roman enclosures. An archaeological watching brief carried out on the excavation of a cable trench crossing one of these enclosures recorded no finds or features of archaeological significance. If the cropmarks are demonstrated to reflect buried archaeological remains, such remains are unlikely to represent a constraint to the Site's development and their loss could be mitigated through a programme of archaeological recording in consultation with the Shropshire Council Historic Environment Team.

- 7.8.4 The land at the ‘Garden Village’ at Tasley includes the Grade II Listed. The Leasowes and the former Farm House at The Leasowes. It also includes the non-designated historic farmsteads at Footbridge Farm, Hundred House Farm and Roundthorn Farm. Furthermore, due to the scale of the site it could have archaeological potential. There has been no proper assessment of the potential harm on Morville Hall which is a Grade I Listed Building. EDP conclude that the Tasley proposals could lead to substantial harm to the significance of the heritage assets on and adjoining the site.
- 7.8.5 The submitted Heritage Assessment has been completed without the benefit of site visits and has been written using photographs taken by the landscape architect as part of the LVIA and not the primary experience of the heritage expert. As such, the conclusions drawn by the Assessment cannot be considered robust and should be treated with caution. Furthermore, there are a number of technical deficiencies in the assessment which potentially underestimate the number of listed structures, making the focus of any setting assessment too narrow and potentially therefore any conclusions drawn understated and misleading. The implications of these deficiencies translate to the assessment of the two listed buildings within the site, which does not fully and properly assess the issues.
- 7.8.6 The assessment does not properly acknowledge that the two listed buildings are set within agricultural land and that aspect of their setting, which is fundamental for farm buildings, would largely be eradicated by the development. Accordingly, it is considered the Tasley proposals have the potential to cause substantial harm to the setting of the listed buildings within the site.

7.9 Highways

Vehicles

- 7.9.1 The Assessment undertaken by PJA fully recognises that Stanmore Garden Community benefits from direct access from an A Road. However, in relation to Tasley as demonstrated in paragraph 4.4 above, the residential element of the Tasley site has **no** direct access to the A458 and access would have to be provided by a minor B road which would be entirely inappropriate for this scale of development.
- 7.9.2 The high level appraisal of the highways undertaken by PJA, concludes that the Stanmore development can be undertaken which demonstrates that with appropriate mitigation any impact on the highway network can be managed. However, the promoters of the Tasley Scheme have not given detailed consideration to the highway impact of the development, in particular the impact of trips from Tasley to Bridgnorth town centre, where there are known concerns with junction capacity. Given the anticipated increase in vehicle movements from the Tasley scheme through Bridgnorth, it is important to take into consideration the ability to undertake the required highway improvements, PJA have highlighted that there is very limited capacity to undertake improvements physically, due to proximity of buildings; and from a land availability point of view, as the extent of the adopted highway is very limited.

Pedestrian & Cycles

- 7.9.3 Whilst both sites are a similar distance from Bridgnorth Town Centre; it is important to take into account the connectivity of the proposals with Bridgnorth. The Stanmore proposals have been designed to promote sustainable modes of travel, this includes adopting a design which promotes sustainable modes of travel and reduction in the dependence on private vehicles. The Stanmore proposals also include pedestrian and cycle links across Hermitage Ridge which will provide a convenient accessible route from Stanmore to Bridgnorth Low Town.

- 7.9.4 PJA have concluded that there are significant connectivity issues at Tasley, in particular between the proposed development and Bridgnorth. The lack of available land in the control of the promoter of Tasley fronting onto A458, any pedestrian or cycle routes would require a significant diversion away from the desire lines and result in potentially considerable connectivity challenge.
- 7.9.5 There are also significant concerns with creating the pedestrian footbridge required by site Allocation BRD030 at Tasley. PJA have concluded that it is not possible to construct a footbridge along the pedestrian and cyclist desire lines between the site and Bridgnorth Town Centre, without acquiring third party land; it is understood that the owners of the third party land have declined to make it available. PJA conclude that given the feasibility issues with delivering the footbridge, which is required to satisfy Site Allocation BRD030 in relation to connectivity to Bridgnorth, pedestrians and cyclists will be forced to use unsafe routes at grade over A458, which will be a major constraint to the development.

7.10 Public Protection

- 7.10.1 Stanmore is close to sources of noise from road and commercial development.
- 7.10.2 Tasley is also close to sources of noise from road and commercial development, although in contrast to Stanmore, a more heavily trafficked road and the commercial development will include a relocated livestock market. Noise and odour from the livestock market will not be mitigated by trees. A buffer to give distance will take out a good proportion of the site to be allocated and if it becomes Green Infrastructure, the experience of the user will be compromised.
- 7.10.3 Tasley also adjoins a site consented for mineral extraction.

7.11 Other Strategic Considerations

- 7.11.1 Stanmore offers potential to enhance the sustainability of the existing cluster of development at Stanmore and The Hobbins.
- 7.11.2 The location of a new employment area to the west is not attractive to businesses and whilst there is an allocation already in the SAMDev, it has generated limited interest. The SAMDev allocation ELR011/a of 6.7ha will provide sufficient quantity to satisfy demand for the LPR period to 2038.
- 7.11.3 Public consultation has resulted in Bridgnorth Town Council objecting to Tasley and supporting Stanmore.

8 Conclusions

- 8.1.1 The Consortium conclude that the Local Plan in its current form has been developed on the basis of misleading evidence and assessments of sites and that it is failing to deliver sustainable development and positive benefits, which must seriously question whether it can deliver the strategic policies.
- 8.1.2 It is considered that the consultation being undertaken by the Council on the Local Plan is fundamentally flawed, in particular it is not made clear that all documents have equal status as part of the Regulation 18 Consultation and also that the consultation welcomes comments on the promotion of alternative sites.
- 8.1.3 The approach proposed in these representations to release an area of Green Belt to facilitate Stanmore Garden Community is supported by the conclusions of the SAMDev Inspector and would address the housing and employment need of Bridgnorth.
- 8.1.4 The Local Plan polices need to be stronger to achieve sustainable development that responds to the climate change emergency. They should recognise how the location of development and mixed use sites can reduce the need to travel.
- 8.1.5 Locationally, Stanmore provides the best opportunity to attract inward investment and to allow existing business to expand, such an option would be the most sustainable and accord with the NPPF in relation to planning for large scale development. As the employment is fixed to Stanmore, it follows the Garden Village has to be located at Stanmore. This will deliver sustainable development and enhance sustainability of the existing cluster of development.
- 8.1.6 It is considered that the Sustainability Appraisal (SA) underpins Local Plan is flawed due to the incomplete evidence base including the justification for site selection and its failure to consider fully reasonable alternative sites including Stanmore Garden Community. There are flaws in the scoring and the methodology that need to be addressed. The findings of the SA do not support Shropshire Council's approach in Bridgnorth. The SA demonstrates the preferred site, Tasley Garden Village, does not score as well and is not rated as highly as an alternative, Stanmore Garden Community. The evidence base therefore does not support the preferred site allocation and indicates Stanmore Garden Community should be allocated for development.
- 8.1.7 There are serious questions about the deliverability of the proposed allocation at Tasley site and its suitability in planning terms. These Representations clearly demonstrate that there are major issues with the availability of the land within the Tasley site to deliver Site Allocation BRD030. Not only does the Tasley promoter not control the land required to deliver the scheme, but the land in their control is so constrained that it is not possible to provide vehicular and pedestrian access directly to the residential proposed from the A458. Connectivity to Bridgnorth is a key objective of the Site Allocation BRD030, lack of such connectivity is a failing in the SA that requires mitigation, yet it is demonstrated that it is simply not possible to provide a safe and convenient access over the A458.
- 8.1.8 It has been demonstrated in this submission that there are significant issues with suitability of the Tasley Site, particularly in relation to landscape and visual impact, harm to important heritage assets, impact arising from existing mineral assets and ecology.
- 8.1.9 The evidence set out above also identifies a major issue with the implementation of the Livestock Market relocation; a specific proposal within the Saved SAMDev Plan. The Livestock Market relocation is essential to facilitate the implementation of two existing housing allocations within the SAMDev Plan i.e. BRID001/BRID020b, BRID020a. It is clear from the evidence submitted that there is a strong likelihood that the Livestock Market relocation will not take place if Tasley Garden Village is to go ahead.

- 8.1.10 These representations have clearly demonstrated that the employment proposed at Tasley is not a suitable location and would not be capable of being delivered; a local property agent has strongly advised that the deliverability and viability of the proposed 16 hectares at Tasley is questionable in market terms. Based upon the evidence presented, it is considered that the employment element of the scheme would not be viable or deliverable.
- 8.1.11 In relation to design, it is clear that the Tasley fails satisfy the Garden Villages Principles and therefore fails to comply with the requirements to the Site Allocation BRD030. It is clear that the proposals for the Tasley development is a Garden Village in name only and a standard suburban layout in practice.
- 8.1.12 The Stanmore Consortium has spent the last two years developing its plans for a new, genuine garden community at Stanmore. The proposal has been adapted, taking in the views of local people and will incorporate exemplar design, affordability, significant amounts of green space, services and facilities that the community needs. The draft Local Plan proposes the release of land from the Green Belt for employment land at Stanmore, as such recognising the need to ensure Bridgnorth's sustainable economic future and to address the views of the Inspector who examined the SAMDev, who recommended an early review of the Local Plan with a review of the Green Belt, which serves to constrain development east of Bridgnorth. This submission demonstrates that exceptional circumstances exist to release land for Stanmore Garden Community from the Green Belt, the exceptional circumstances have been reinforced by the Council's proposal to release Green Belt for employment land at Stanmore and the Garden Community consolidates this to deliver sustainable development.
- 8.1.13 The proposed Stanmore Garden Community will be delivered by the Consortium who will provide a 'legacy landowner' with the ambition to create a community which has identifiable character and style with a Village Centre containing local shops, residential squares and community facilities, then spreading out naturally to less dense areas of varied housing. This is a unique opportunity for the Council to create a new village with architecture redolent of local styles and providing a real 'sense of place' that complements Bridgnorth, comfortable in its setting and responding to its environment.
- 8.1.14 It is considered that the settlement strategy for Bridgnorth is not justified as it is not an appropriate strategy, taking into account the reasonable alternatives. These representations demonstrate clearly that the proposals for Stanmore Garden Community offer an excellent opportunity to deliver a development, with 30% affordable housing which meets the Garden Village principles. The amended Masterplan for Stanmore Garden Community (Appendix J), reduces the amount of land to be removed from the Green Belt, and the Vision for Stanmore Garden Community (Appendix R) clearly demonstrates an exemplary garden community in accordance with the Garden Village principles.

Appendix A Socio Economic Study by Hatch Regeneris

Appendix B Green Belt Position Note - prepared by EDP

Appendix C Letter from Livestock Market Operator - Nock Deighton – 8th June 2020

Appendix D High Level Transport Appraisal Prepared by PJA - March 2020

Appendix E Transport Technical Note prepared by PJA – Response to SC Key Considerations

Appendix F Andrew Dixon & Co. – Letter – 8th July 2020

Appendix G Landscape and Visual Site Comparison – Prepared by EDP

Appendix H Ecology Position Paper – prepared by EDP

Appendix I Site Comparison: Heritage Matters - prepared by EDP

Appendix J Concept Masterplan Rev C – MACE September 2020

Appendix K A Response to Tasley Garden Village

Appendix L Stanmore Exceptional Circumstances including Chris Young QC Opinion

Appendix M Connection through Woodland – prepared by PJA

Appendix N Landscape & Visual Appraisal – prepared by PJA

Appendix O EDP Ecology Technical Note – prepared by EDP

Appendix P Agricultural Land Quality – prepared by EDP

Appendix Q Heritage & Archaeology Assessment – prepared by EDP

Appendix R A Vision for Stanmore Garden Community

Appendix S Employment Led Development of a Garden Village Community -
prepared by MacMullen Associates

Appendix T Arboricultural Appraisal – prepared by EDP

Appendix U Shropshire Council Extract Site Assessments: Bridgnorth Place Plan Area
– November 2018 Stage 3

Appendix V Delivery Strategy and Phasing – prepared by Stanmore Consortium

Appendix W Statement of Public Consultation – Camargue September 2020

Appendix X Affordable Housing Proposal Stanmore. FINAL 28.9.2020



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Appendix 2 - Addendum to MacMullen Associates Ltd Report: March 2020 (22 February 2021)

Stanmore Business Park and Proposed Stanmore Garden Community.

Employment-Led Development of a Garden Village Community

Addendum to MacMullen Associates Ltd Report: March 2020

1.0 Introduction

1.1 Shropshire Council published its initial draft of the Local Plan review with 'preferred sites' in November 2018, including a Garden Village settlement at Stanmore allied with a significant expansion of Stanmore Industrial Estate, on land to be released from green belt. The landowners submitted a full suite of proposals to the Council in March 2020 following extensive public consultation. In April 2020 the Council announced that it was minded to delete the Stanmore Garden Village site, moving its preferred site to Tasley, west of Bridgnorth. The draft Local Plan retained a proposed allocation of 11.4 ha of (employment) land at Stanmore for expansion of Stanmore Business Park.

1.2 In light of representations to the Local Plan made by a number of parties, we have been instructed to update the report submitted to the Council in March 2020.

1.3 MacMullen Associates has advised the owners of Stanmore Business Park (formerly titled Stanmore Industrial Estate) since early 2015 and has detailed knowledge of all transactions there.

2.0 Stanmore Business Park

2.1 At February 2021 all available units on the Business Park were fully occupied. It is reported by the managing agents that the effects of Coronavirus have not been severe. One or two occupiers have required some initial assistance with deferment of payments, but all rents are currently up to date and enquiries for space continue to be received. The large wartime Building 3, vacated in December 2019 was subject to a planning application and is now being substantially reconstructed (photo's below at end November 2020) but will not be available for occupation until spring 2021.



Rebuilding works under way at Building 3. 4,520 sq m lettable area.

2.2 Despite representations on the Local Plan review and suggestions by objectors to the larger Stanmore Garden Village proposal that there were '*many empty buildings*' on the Business Park and areas of undeveloped land for which there was '*no demand*', there has in fact been very little vacant built space on the estate since 2015; the few units which were empty could not be let without significant upgrading (they were refurbished and are now all occupied) and the only undeveloped (suitable) land of 1.3 ha approx. ('The Square') was leased as a transport and storage yard until late 2018 and only became 'available' at that point. Until confirmation was received that enhanced electrical capacity could be made available, the owners could not plan new development (see 3.0 below). A detailed planning application is now to be submitted in April 2021 for approx. 3,250 sq m of new industrial units.

3.0 Electricity Supply

3.1 Lack of electrical supply capacity limited development of further buildings at Stanmore for several years. Recently negotiations with Western Power Distribution, the network operator, to provide a more stable (underground) supply to Grainger & Worrall, the largest occupier, were coupled with an application to WPD for enhanced capacity to enable expansion of the estate. A provisional timetable has been set for a new cable connection to the Stanmore site from Bridgnorth and wayleaves are being negotiated. Western Power provisionally propose to commence the upgrading works end-summer 2021; final confirmation of the start date is awaited and in the meantime Stanmore Properties has placed an official order for the works to be undertaken.

3.2 The enhanced supply will enable the proposed new units to be serviced, with further electrical capacity available if additional land is allocated for development.

4.0 Stanmore Garden Community

4.1 The promoting Consortium submitted a revised proposal to the Council in September 2020, reducing (by 90ha) the area of land originally proposed by the Council to be removed from green belt. The areas proposed for Employment Use remained the same, at a net 16 ha, in three plots to the northeast, west and north of the existing Business Park. The north western area is identified in the Consortiums masterplan as appropriate for 'Start-up and Incubator Units' and understood suitable for the E(g)(i and (ii) use classes (former B1 or Research and Development uses) and could also be suitable for B2 and B8 uses with appropriate conditions. That element of the land (4.6ha) is not currently included as a draft allocation.

4.2 The remainder of the land forms a direct extension to Stanmore Business Park, accessed from it and reliant upon its services and infrastructure which are immediately available. Our view is that the March 2020 report and its conclusions are not affected by the changes to the overall proposal.

5.0 Shropshire Council (SC)

5.1 The Council removed the 'preferred site' allocation of some 850 houses with Employment and communal facilities at Stanmore from its first draft of the Local Plan review, to a site approximately 3 miles to the west, at Tasley. It maintained a draft allocation of 11.4 ha of land for Employment adjacent to Stanmore Business Park to provide for its growth in the Plan period. We believe that allocation of further land is essential to allow for both organic growth and incoming investment although deletion of the housing will not address the lack of affordable accommodation for the local workforce, nor the high level of in-commuting identified in our earlier report.

5.2 The Business Park owners are willing and intend to develop (speculatively) units in the range 200 – 600 m2 for which historically there has been strong demand. The availability of serviced land will permit the development of larger units on a ‘build to suit’ basis. The omission of the proposed further 4.6 ha for Start-up/Incubator/Research and/Development would restrict the flexibility and width of the overall employment ‘offer’ at Stanmore, which is regrettable.

6.0 Bridgnorth Town Council (BTC)

6.1 BTC supported the Stanmore Garden Village after the public consultation. Subsequent to Shropshire Council’s support for the Tasley alternative it submitted detailed representations under the initial and repeated Reg 18 consultations. Its conclusion was to continue to support development at Stanmore provided SC put forward an ‘exceptional circumstances’ case to remove land from green belt; it objected (see below) to the proposals at Tasley for both housing and employment, emphasising issues of travel and commuting.

‘Apart from normal town centre employment such as working in retail, most local commercial and industrial type employment is located on the east bank of the river within the town or on Stanmore Industrial Estate. Pre-Covid 19, there was (sic) approximately 1,700 people employed at Stanmore. A significant proportion of residents of working age commute to work in neighbouring towns, such as Telford, Wolverhampton, Dudley, etc.

Virtually all of this commuting is to destinations on the east side of the river, resulting in most commuters living on the western side of the town having to cross the river within the town before continuing their outward journey, and again when returning home. The Tasley Garden village site is just the wrong side of the Town.

We support the proposed expansion to the Stanmore Industrial Estate. However the expansion is restricted to employment land uses [so] having been taken out of the Green Belt for that purpose, it cannot be subsequently used for housing development.’

6.2 This statement shows local support for the provision of further employment at Stanmore. It should be noted that the expansion land proposed there is contained within (and serviced/accessed only from) the Industrial Estate and any suggestion of residential use would be prejudicial to the employment uses already on the Estate and thus unacceptable.

7.0 Bridgnorth Plan Steering Group

7.1 This group was set up in June 2019 by a number of individuals, including some members of Bridgnorth Town Council, with the intent of preparing a ‘Town Plan’ but is not part of the Council. It has held meetings, published a commentary on Bridgnorth and made representations on the review of the Shropshire Local Plan.

7.2 The table below was produced as part of its work and ‘identifies’ claimed areas of available, undeveloped land, allocated for EMP purposes, in the SAMDev Plan. These are quoted to support its argument to resist allocation of any more Employment Land in Bridgnorth ‘for the time being’.

Additional land at Tasley, south of the A458 ²	6.7 ha
Land at Old Worcester Road, for recycling and environmental firms	1.5 ha
Stanmore Industrial Estate	2.8 ha
Bridgnorth Aluminium	0.3 ha
Faraday Drive	0.3 ha
Chartwell Business Park	4.6 ha
TOTAL	16.2 ha

7.3 We have pointed out to the Steering Group that the areas highlighted were either smaller than claimed, in use, not 'available' or already under development. Specifically we comment:

7.3.1. Land at Tasley - development delayed by the deaths of two owners but now being promoted as part of a 500 unit housing/mixed use allocation in the SAMDev plan - now known as '**Tasley Gateway**'. Note: Shropshire Council is currently (Feb 2021) considering a 'pre-app' proposal for this entire development. Delivery expected 2023.

7.3.2. Land at Old Worcester Road. Has been identified as suitable for a specialist purpose (recycling) because of its location, not general employment use.

7.3.3. Stanmore Industrial Estate. See Para 2.0 above. The site (for which a planning application is imminent) is 1.3ha gross (not 2.8ha) and is being brought forward for development.

7.3.4. Bridgnorth Aluminium. This is 'de minimis' and understood to be reserved for the owner's expansion, so not 'available'.

7.3.5. Faraday Drive. Again 'de minimis' and reserved for expansion by its owners.

7.3.6. Chartwell Business Park. Development here was delayed by the death of the owner. Since 2019 a new petrol filling station/roadside convenience shop has been completed. 4 trade counter units (1,650 sq m) are either occupied or near completion and negotiations are close to completion for a new 800 sq m building. The remaining available land amounts to less than one hectare.

7.3.7. Total (currently) available land. Until the Tasley allocation becomes available, following grant of planning and extensive enabling works, the quantum of available land in Bridgnorth is **between 1ha and 2ha**.

7.4 The Steering Group has subsequently published a revised view expressing 'tentative support' for allocation of additional employment land in Bridgnorth, but only beyond 2038, on the grounds that the allocations in the SAMDev Plan are sufficient. It gave no further explanation for that view.

8.0 Save Bridgnorth Green Belt Group (SBGB)

8.1 SGBG wrote to Shropshire Council in December 2020, objecting to the release of 11.5 ha of land at Stanmore to permit expansion of the '*Industrial Park*'. Their objection is that no 'exceptional circumstances' exist to justify removal of land from green belt. They state

'The reason given for the proposed employment designation at Stanmore is, as expressed in para. 5.34 of the Cabinet Report, that "the release of land from the Green Belt would be beneficial in supporting

the future expansion needs of the Industrial Park". That is not an "exceptional circumstance" that would justify removing land from Green Belt designation, especially when significant areas of employment land exist, undeveloped, in nearby Bridgnorth, and other large areas are proposed to be allocated within the development boundary of Bridgnorth itself.

The underlined statement (our emphasis) is demonstrably inaccurate.

9.0 Other Expert Evidence.

9.1 The December 2020 **Shropshire Economic Development Needs Assessment (EDNA)** prepared for Shropshire Council by consultants Lichfields and JLL identifies in Bridgnorth only the single plot of land at Stanmore Industrial Estate (referred to above) of '2.5acres' for up to 40,000 sq ft 'build to suit'.

9.2 Opinions were canvassed from a number of experienced commercial agents active in Shropshire on the question of where employment land should be located to satisfy market demand in Bridgnorth. The views expressed by Andrew Dixon & Co encapsulated the general opinions expressed by the agents we spoke to and their opinion is contained in a letter, provided to the Council, dated 8 July 2020. In summary Dixons confirmed that demand at Bridgnorth is heavily concentrated to the East of the River Severn, largely at Stanmore Business Park and the level of demand for (and commercial viability of) land west of the River Severn is considered limited and adequately provided for in the SAMDev allocations (6.7ha net of landscaping) of employment land adjacent to the relocated livestock market.

10.0 Conclusions

10.1 Although there is undeveloped allocated land under the SAMDev Plan, there have been good reasons why the designated area at Tasley, south of the A458 was delayed, though it is known now to be in a 'pre-app' procedure with the Council and will be approaching planning application stage. A search for any other available Employment land reveals a highly restricted supply, part of which (Chartwell) is under development and the remainder in a number of very small parcels which are clearly not 'available'.

10.2 the evidence shows that where the demand is strongest (at Stanmore Business Park) the supply of land for the Plan period to 2038 is at its lowest – at only 1.3ha. This is unsatisfactory and gives rise to the possibility of successful firms moving out of Bridgnorth to find accommodation – as has been recorded in the past, and justifies an allocation for new employment in the Local Plan Review.

10.3 It is clear to us that, where demand is shown to be strong, as evidenced by the very high level of occupation at Stanmore Business Park; where there are businesses which have historically expanded organically and express the wish to continue expansion in the same location; where firms have related supply chains and rely on interaction with neighbours, then making provision for growth, increasing employment and potential incoming investment is highly desirable and satisfies the test for demonstration of 'exceptional circumstances' to permit the release of land from green belt.

10.4 It is our view, based on long experience, that in any area where economic activity is strong and planned growth is encouraged by adopted policies, that a reasonable supply of employment land (and actual built floorspace) must be readily available so that when a business needs it,

accommodation can be supplied. Residential developers will build out housing land speculatively, provided demand exists. Commercial developers may develop speculatively, particularly where smaller units are in known demand, but a stock of serviced land needs to be available, ready to satisfy larger new requirements which can appear quite suddenly but need specific types or sizes of building. In its absence businesses either do not come or, if already in the locality and needing expansion, may have to move to a locality where suitable land or property is available.

10.5 The contentions of various parties commenting on the Shropshire Local Plan review are clearly erroneous in claiming the town has a more than adequate supply of employment land. The evidence shows that it does not. Moreover a recent search for available industrial-type buildings in the Bridgnorth area found no vacant space at all on offer. It is our opinion that the original proposal by the Council to allocate both housing and additional employment at Stanmore was well-founded and it is regrettable that the Council has not pursued its original plan under which employment and housing allocations supported each other, creating a sustainable solution to established needs and addressing problems experienced by employers who cannot recruit labour locally. Nevertheless, the clear need for employment land lies to the east of Bridgnorth and the proposed allocation at Stanmore, in the draft Shropshire Local Plan, should be supported.

David MacMullen FRICS

Director

MacMullen Associates Ltd

February 2021

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Appendix 1.

Letter from Andrew Dixon & Co.

Our ref : JAGD/SLW/3603

Direct line : 01952 521005

Your ref :

Date : 8 July 2020

**ANDREW DIXON
& COMPANY**

**Chartered Surveyors
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Grosvenor House, Central Park,
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Director
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Dear David

**Re: Proposed Mixed Use Development at Tasley, Bridgnorth by Taylor Wimpey
Viability of Employment Land in this Location**

Further to your recent instructions, we understand that you require a brief report on the viability of a 16-hectare employment site at Tasley in Bridgnorth and the likely level of demand for this land in the current marketplace.

As you are aware, Andrew Dixon & Company is an independent firm of Chartered Surveyors with offices in Telford and Cannock, which specialises in commercial and industrial property consultancy, being experienced in development, investment, letting and sales of business premises within Shropshire and the West Midlands. We are currently selling and/or letting in excess of 1 million square feet of commercial property per annum and for six consecutive years have been one of CoStar's 'Top Ten Industrial Agents' in the West Midlands (since the inception of the Agency Awards by CoStar).

The scope and breadth of work Andrew Dixon & Company undertakes in the West Midlands area can be perused on our company website www.andrew-dixon.co.uk. We also carry out property work for a number of substantial enterprises, which is not reflected on our website. This includes land acquisition and sales for private individuals, nationals and supermarkets, and we have acquired and sold residential development sites for all the major house builders, as well as a number of local developers. As such, we are intimately connected with the marketplace in Shropshire and well placed to advise on the likely demand for employment land in Bridgnorth.

We understand that Taylor Wimpey has submitted a proposal for a large housing development (1,050 houses initially) at Tasley, which includes at least 16 hectares of employment land, stated to be 'to meet Bridgnorth's future needs' and situated on the A458 adjacent to Morville Heath. Taylor Wimpey is not an industrial developer and its intentions for the employment land are not made clear. We further understand that land extending to some 13 hectares net in Shropshire's SAMDev 2015 Plan has already been allocated to relocate the Livestock Market and provide 6.7 hectares of employment land south of the A458 and opposite the Wenlock Road junction. Our understanding is that this allocation was made largely to accommodate potential businesses, which would complement the market use (eg agricultural machinery dealers), but such demand will be limited and the area allocated should comfortably meet it.

Regulated by  **RICS**

JAG Dixon MRICS • JN Dixon MRICS • EL Home BSc (Est Man) MRICS • Katharine M Cope BSc (Hons) MRICS
Alex Smith MRICS • Emily Summerfield MRICS

Also at Cannock

Andrew Dixon & Company Ltd. Registered in England No. 05086675

In our opinion, the land at Morville Heath is not a suitable industrial location for many reasons, but principally because transport links to that location are limited, with the main access roads being the A442 Telford to Kidderminster road – which is a secondary route – and the A454 and A458, which direct traffic from the West Midlands and Wolverhampton. The Shropshire employment market is heavily dominated by Telford with its' superior access to the motorway network. As a result, at least two thirds of the industrial/commercial rateable values in Shropshire are located within Telford as opposed to the greater Shropshire area.

Furthermore, the Bridgnorth industrial market tends to be dominated by Stanmore Industrial Estate, which is located east of the River Sever as opposed to west of Tasley. We understand there is approximately 650,000 square feet of accommodation on Stanmore, with no availability at the moment and reportedly strong demand for any unit that becomes vacant. Average rents are based on £5.00 per square foot for refurbished units. If Bridgnorth's needs are to be met by the provision of more land, market forces would suggest it needs to be in the vicinity of Stanmore. There is a further small industrial estate at Chartwell, where new units are being built and rents are somewhat higher, but this estate is attracting trade park users, having good road prominence and therefore benefitting from passing trade.

In order to justify a development of industrial units at Morville Heath you would need to achieve a rent of at least £6.50 per square foot, or a freehold price of over £100 per square foot. The industrial market in Bridgnorth currently only approaches these levels east of the River Severn, where firms have far better accessibility to Telford and the West Midlands conurbation. To the west, values are nowhere near this level and the subject land does not have the right profile to attract trade counter users as there is no passing trade.

In addition, we very much doubt that there would be a sufficient electricity supply to service an industrial development in this area and the costs of reinforcement would be unacceptable for a developer already finding rents and prices at unviable levels. Simply to achieve freehold plot sales a developer would have to install roads, drainage and services and these costs would impact too heavily on the typical land values achievable in such rural locations.

In conclusion, in our opinion there would be no real demand for an employment site in this particular location and it would not be financially viable.

We trust this is sufficient for your immediate purposes, but should you require any further assistance please do not hesitate to contact us.

Yours sincerely

J A G Dixon MRICS*
Andrew Dixon & Company

Appendix 3 - WSP Transport/Traffic Brief for the review of potential strategic sites for Bridgnorth

Executive Summary

- A Brief has been prepared by WSP for the Council (Shropshire) to assess the transport implications of two urban extension sites which are currently being promoted for Bridgnorth, Shropshire.
- The purpose of the work summarised in Brief is ill-defined – merely termed as “an assessment” to assist the Local Plan Review.
- The objectives of the Brief are not set out. The implied objectives do not align with relevant national or local transport Policy.
- Further, the methodology can only be implied from the content, with neither defined appraisal criteria, nor measurable context, other than a rudimentary grading approach of basic existing transport conditions. There is no explanation as to how any implied purpose or objectives of the Brief are to be met. Enhancement or mitigation opportunities of both site promoters transport strategies are ignored.
- As the purpose, objectives, methodology and measurement criteria are all absent, the means of appraisal against relevant Policy consideration is impossible to evaluate.
- The unfortunate impression that this portrays is that the appraisal is an exercise to deliver a pre-determined outcome.
- This impression is re-enforced by the stated intention to assess based on limited traffic data collected by one of the two parties, ignoring the existence of the more extensive data collected by the other which is already available to the Council.
- The inappropriateness of this is heightened by intention to solely rely on traffic data collected by one of the parties during the height of the current pandemic in October 2020, supplemented with further data collected either by the same party or on behalf of the highway in November 2020. No mention though is made of traffic data collected in 2019 prior to the pandemic by the other party.
- For all of these reasons, the Brief is not fit for purpose as an appropriate document to evaluate and rank the two proposals, assuming this is the purpose. At best it would have been a tool suitable as a high level sifting exercise for multiple Call for Sites promotions.
- To avoid subsequent challenge and to withstand scrutiny at Local Plan Inquiry review on soundness of the Plan, the Brief must be refashioned and significantly extended with purpose, objectives and means to identify the appropriate outcome for the Community (people, places, activity) in the context of adopted and emerging policy clearly stated. The current Brief meets none of these requirements.
- It is imperative that as part of this reconsideration and redraft, that each proposal should have the opportunity to present their proposals against published objectives.

Introduction

1. This is a review by David Tucker Associates (DTA) commissioned by Apley Estate to evaluate the appropriateness of the WSP site assessment brief (30th November 2020) for a study, on behalf of Shropshire County Council (SCC), of the two urban extensions being promoted for Bridgnorth, Shropshire. These are Stanmore, promoted by Apley Estate and Stanmore Properties, located to the East of Bridgnorth and Tasley promoted by Taylor Wimpey, located to the Southwest of Bridgnorth.
2. The purpose of the Brief should be to assess the relative transport performance of the sites against the priorities set out in planning policy.
3. Prevailing national and local planning policies are the benchmark against which the relative performance of the sites should be assessed.
4. At a national level policy is set out in the National Planning Policy Framework (2019). There are three overarching interdependent objectives aimed at achieving sustainable development. which are
 - economic (supporting growth, innovation, and productivity)
 - social (supporting communities) and
 - environmental (supporting the natural, built and historic environment) (para 8, Appendix A).
5. The Framework addresses sustainable transport in the context of plan making and sets out an integrated approach reflecting travel shaped by communities and development (para 102-109 inclusive, Appendix A). Specific tests are set out in relation to developing sustainable travel; ensuring safe and suitable access for all and managing impacts.
6. Ordinarily at local level the Local Transport Plan (LTP) expands local priorities. The current LTP3 covers the period from 2011. At present, however, Shropshire Council do not have a LTP4 (2021-2036) to provide a framework for the forthcoming Local Plan period as this is being prepared in parallel to the Local Plan. The status of this LTP4 is set out in the Place Committee paper dated 9th December 2020 which includes a critique of the current Plan (LTP3) and the likely future policy direction (Appendix B). This identifies priorities arising from SCC's climate emergency declaration, Brexit, and Covid-19, whilst signalling a shift from a transport mode-based approach, which is heavily car focused, to prioritise people, places and activities.

The WSP Brief

7. The Brief does not set out an appraisal framework; or the context or policies against which it seeks to appraise the sites. Whilst the deliverables are identified as a 'Red Amber Green' Assessment (or similar) based on the accessibility of each site to local services/facilities

/employment' this does not reflect the national and local priorities. It is essential that these are defined from the outset to reflect the people, places and activities approach as advocated by Shropshire themselves.

8. The list of tasks set out in the Brief follows a traditional mode-based approach but is not a coherent methodology to determine impacts or effects. Beyond a basic recording of existing conditions, current bus services and local facilities, at its core is a traditional traffic assessment; the adoption of straightforward traffic generation techniques; traffic distribution against journey to work Census data; an all or nothing assignment; and percentage impact comparisons on highway networks.
9. In terms of local facilities, this appear to be a standalone exercise rather than integral to the appraisal. Both sites are however of sufficient scale that facilities will be expanded or developed and therefore it is important that any comparison depicts fairly the future scenario. These facilities may become less relevant during the plan periods as behaviour and technology changes, e.g., services accessed online and more reliance on home delivery, such that the benefits and thresholds for agglomeration benefits are likely to further diminish. This should also be considered.
10. Public transport cannot be solely related to the existing bus services but should reflect the opportunities that the locations present to provide a long-term sustainable solution that works for the community as a whole. It is acknowledged that there are certain challenges related to Covid-19 although the local topography will necessitate such services regardless of the direction of development. As with the local facilities appraisal, public transport appears to be independent of the travel demand appraisal whereas an integrated approach is required.
11. To estimate travel demand it is best practice to adopt an all-trips approach rather than solely focus on car trips. It is not explicit within the Brief but there is no reference to apportioning travel demand by mode which implies that a fixed car trip generation approach may be adopted. The separation of accessibility and non-car modes reinforces this perception. As such the appraisal takes no account of the potential to affect changes in car use because of location or strategy.
12. The travel demand is distributed based on a single purpose; journey to work. Commuting trips will account for a significant proportion of car trips during the peak hour periods but the approach is likely to distort travel patterns within the community. Furthermore, the differences between the sites are likely to be lost by over generalisation of the local geography (averaging out) which is to some extent inevitable due to the size of the existing town i.e., the Census data is likely to split the town into two.
13. The scale of the proposals warrant consideration of how the development travel patterns will integrate into the existing travel patterns. This step of "balancing the books" between forecast trips leaving home and forecast trips arriving at work is often omitted in traffic

assessments. The resulting double counting of trips however masks initiatives to encourage walking and cycling and misrepresents demand for bus travel in route planning. It is therefore unhelpful in comparative exercises such as this. This could be assessed by 'simple' spreadsheet model or by applying internalisation assumptions.

14. The methodology for assignment (routeing) of trips onto individual elements of the transport network (i.e. roads) is not explicit but it is likely to be on an all or nothing basis and again an over generalisation of the geography is likely to result in a concentration of traffic on specific routes.
15. To assess the baseline traffic, onto which the development traffic will be added, the Brief solely cites data sources including surveys undertaken during the height of the pandemic. This is an ongoing and present challenge, but it is essential to demonstrate that the data is fit for purpose i.e., it is inappropriate and inconsistent to assess one site (Stanmore) based on pre-pandemic traffic and the other (Tasley) based on suppressed traffic patterns during the current crisis.
16. The Brief makes no reference to future year highway network appraisal. This should pay due regard to background traffic growth and in particular make appropriate allowance for the inclusion of traffic generated and assigned to the local highway from committed development or other allocated Local Plan development, as well any relevant committed highway or transport infrastructure.
17. There is no transparency about the comparative geographical scope of study of the two sites. This is necessary to ensure that there is consistent rationale to the relevant scope of network to be appraised to avoid bias from under or over-representation of the local road network.
18. Highway impact in the Brief is based on a simplistic test of percentage change. As an output, percentage traffic change is a particularly inappropriate measure of relative impact. This is because it fails to account for existing operational performance; the potential for deliverable mitigation; and environmental sensitivity relating to the function of the road. In other words, the same percentage change in traffic flow on a congested residential road and a main through road, is liable to have very different environmental and policy significance. It is also a poorly suited approach to derive a measure of the overall effect of the sites in relation to the Community.

Recommendations

19. This Brief is not the tool to meaningfully evaluate the site short list but is suitable to use as a high level sifting exercise at perhaps a Call for Sites stage, whereby 30+ sites are to be whittled down to say, 5.



20. In comparative terms the Brief is unlikely to give a definitive conclusion; it may declare a winner, but potentially somewhat arbitrarily and subject to bias. To avoid subsequent challenge and to withstand scrutiny at Local Plan Inquiry review on soundness of the Plan, the Brief must be refashioned and significantly extended with purpose, objectives and means to identify the appropriate outcome for the Community (people, places, activity) in the context of adopted and emerging policy clearly stated. The current Brief meets none of these requirements.
21. The Brief should aim to identify the best outcome for the Community (people, places, activity) in the context of adopted and emerging policy. The current Brief does not allow this as the objectives have not been set from the outset.
22. This review is not advocating the development of a traffic (or transport) model however the level of appraisal should be proportionate and sufficient to understand the differences between the sites.
23. There are important locational considerations which will have a bearing on choice, but deliverability of each proposal is also important such that the teams promoting sites should have an opportunity to present their proposals against published objectives.

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APPENDIX A

National Planning Policy Framework Extracts

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

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

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

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

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

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



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

APPENDIX B

SCC Local Transport Plan 4 – Briefing Note (December 2020)

6.4 Since LTP3 was produced in 2011, there have been several changes both at Shropshire Council and at wider national and regional levels. The strategic framework for transport is currently changing rapidly, for example:

- Shropshire Council declared a climate emergency in 2019 and set a target to be carbon neutral by 2030.
- Shropshire Council is due to submit a new Local Plan in 2021 which will prioritise and shape development in Shropshire up until 2026.
- The outcomes of Brexit may change patterns of freight and agricultural movements.
- Rapid innovation and adoption of smart technologies and digital communications.
- The ongoing Covid-19 pandemic has changed public perception of transport needs and enabled new questions to be asked about how transport will be used in the future. Whilst strong digital communications have prompted an unprecedented level of home-working and corresponding reductions in commuter-based travel movements, uncertainties around the use of public transport has not only resulted in more people choosing to walk or cycle but also an increase in pressure to use private cars to access work, education, shopping and leisure.

6.7 Previous LTPs have been developed using a transport mode-based approach. However, in reflection of this period of significant change in Shropshire, the next LTP will be developed using an alternative and future ready approach that considers and prioritises:

- People: The different characteristics of people that have an impact on their levels of accessibility i.e., age, gender, mobility, ethnicity etc. and the transport issues that they may experience.
- Places: The different spatial characteristics across the County in terms of urban and rural variations, the scale of settlements, connectivity within and between the towns and rural communities of Shropshire and external connectivity for international, national and regional movements.
- Activities: The different activities that people and organisations in Shropshire use transport and mobility to access or facilitate and how these needs may be changing. An understanding of the requirements for the movement of people and goods in Shropshire, now and in the future will be key.

Appendix 4 - Review undertaken by David Tucker of WSP
Transport/Traffic Brief for the review of potential strategic sites
for Bridgnorth (February 2021)

Executive Summary

- A Brief has been prepared by WSP for the Council (Shropshire) to assess the transport implications of two urban extension sites which are currently being promoted for Bridgnorth, Shropshire.
- The purpose of the work summarised in Brief is ill-defined – merely termed as “an assessment” to assist the Local Plan Review.
- The objectives of the Brief are not set out. The implied objectives do not align with relevant national or local transport Policy.
- Further, the methodology can only be implied from the content, with neither defined appraisal criteria, nor measurable context, other than a rudimentary grading approach of basic existing transport conditions. There is no explanation as to how any implied purpose or objectives of the Brief are to be met. Enhancement or mitigation opportunities of both site promoters transport strategies are ignored.
- As the purpose, objectives, methodology and measurement criteria are all absent, the means of appraisal against relevant Policy consideration is impossible to evaluate.
- The unfortunate impression that this portrays is that the appraisal is an exercise to deliver a pre-determined outcome.
- This impression is re-enforced by the stated intention to assess based on limited traffic data collected by one of the two parties, ignoring the existence of the more extensive data collected by the other which is already available to the Council.
- The inappropriateness of this is heightened by intention to solely rely on traffic data collected by one of the parties during the height of the current pandemic in October 2020, supplemented with further data collected either by the same party or on behalf of the highway in November 2020. No mention though is made of traffic data collected in 2019 prior to the pandemic by the other party.
- For all of these reasons, the Brief is not fit for purpose as an appropriate document to evaluate and rank the two proposals, assuming this is the purpose. At best it would have been a tool suitable as a high level sifting exercise for multiple Call for Sites promotions.
- To avoid subsequent challenge and to withstand scrutiny at Local Plan Inquiry review on soundness of the Plan, the Brief must be refashioned and significantly extended with purpose, objectives and means to identify the appropriate outcome for the Community (people, places, activity) in the context of adopted and emerging policy clearly stated. The current Brief meets none of these requirements.
- It is imperative that as part of this reconsideration and redraft, that each proposal should have the opportunity to present their proposals against published objectives.

Introduction

1. This is a review by David Tucker Associates (DTA) commissioned by Apley Estate to evaluate the appropriateness of the WSP site assessment brief (30th November 2020) for a study, on behalf of Shropshire County Council (SCC), of the two urban extensions being promoted for Bridgnorth, Shropshire. These are Stanmore, promoted by Apley Estate and Stanmore Properties, located to the East of Bridgnorth and Tasley promoted by Taylor Wimpey, located to the Southwest of Bridgnorth.
2. The purpose of the Brief should be to assess the relative transport performance of the sites against the priorities set out in planning policy.
3. Prevailing national and local planning policies are the benchmark against which the relative performance of the sites should be assessed.
4. At a national level policy is set out in the National Planning Policy Framework (2019). There are three overarching interdependent objectives aimed at achieving sustainable development. which are
 - economic (supporting growth, innovation, and productivity)
 - social (supporting communities) and
 - environmental (supporting the natural, built and historic environment) (para 8, Appendix A).
5. The Framework addresses sustainable transport in the context of plan making and sets out an integrated approach reflecting travel shaped by communities and development (para 102-109 inclusive, Appendix A). Specific tests are set out in relation to developing sustainable travel; ensuring safe and suitable access for all and managing impacts.
6. Ordinarily at local level the Local Transport Plan (LTP) expands local priorities. The current LTP3 covers the period from 2011. At present, however, Shropshire Council do not have a LTP4 (2021-2036) to provide a framework for the forthcoming Local Plan period as this is being prepared in parallel to the Local Plan. The status of this LTP4 is set out in the Place Committee paper dated 9th December 2020 which includes a critique of the current Plan (LTP3) and the likely future policy direction (Appendix B). This identifies priorities arising from SCC's climate emergency declaration, Brexit, and Covid-19, whilst signalling a shift from a transport mode-based approach, which is heavily car focused, to prioritise people, places and activities.

The WSP Brief

7. The Brief does not set out an appraisal framework; or the context or policies against which it seeks to appraise the sites. Whilst the deliverables are identified as a 'Red Amber Green' Assessment (or similar) based on the accessibility of each site to local services/facilities

/employment' this does not reflect the national and local priorities. It is essential that these are defined from the outset to reflect the people, places and activities approach as advocated by Shropshire themselves.

8. The list of tasks set out in the Brief follows a traditional mode-based approach but is not a coherent methodology to determine impacts or effects. Beyond a basic recording of existing conditions, current bus services and local facilities, at its core is a traditional traffic assessment; the adoption of straightforward traffic generation techniques; traffic distribution against journey to work Census data; an all or nothing assignment; and percentage impact comparisons on highway networks.
9. In terms of local facilities, this appear to be a standalone exercise rather than integral to the appraisal. Both sites are however of sufficient scale that facilities will be expanded or developed and therefore it is important that any comparison depicts fairly the future scenario. These facilities may become less relevant during the plan periods as behaviour and technology changes, e.g., services accessed online and more reliance on home delivery, such that the benefits and thresholds for agglomeration benefits are likely to further diminish. This should also be considered.
10. Public transport cannot be solely related to the existing bus services but should reflect the opportunities that the locations present to provide a long-term sustainable solution that works for the community as a whole. It is acknowledged that there are certain challenges related to Covid-19 although the local topography will necessitate such services regardless of the direction of development. As with the local facilities appraisal, public transport appears to be independent of the travel demand appraisal whereas an integrated approach is required.
11. To estimate travel demand it is best practice to adopt an all-trips approach rather than solely focus on car trips. It is not explicit within the Brief but there is no reference to apportioning travel demand by mode which implies that a fixed car trip generation approach may be adopted. The separation of accessibility and non-car modes reinforces this perception. As such the appraisal takes no account of the potential to affect changes in car use because of location or strategy.
12. The travel demand is distributed based on a single purpose; journey to work. Commuting trips will account for a significant proportion of car trips during the peak hour periods but the approach is likely to distort travel patterns within the community. Furthermore, the differences between the sites are likely to be lost by over generalisation of the local geography (averaging out) which is to some extent inevitable due to the size of the existing town i.e., the Census data is likely to split the town into two.
13. The scale of the proposals warrant consideration of how the development travel patterns will integrate into the existing travel patterns. This step of "balancing the books" between forecast trips leaving home and forecast trips arriving at work is often omitted in traffic

assessments. The resulting double counting of trips however masks initiatives to encourage walking and cycling and misrepresents demand for bus travel in route planning. It is therefore unhelpful in comparative exercises such as this. This could be assessed by 'simple' spreadsheet model or by applying internalisation assumptions.

14. The methodology for assignment (routeing) of trips onto individual elements of the transport network (i.e. roads) is not explicit but it is likely to be on an all or nothing basis and again an over generalisation of the geography is likely to result in a concentration of traffic on specific routes.
15. To assess the baseline traffic, onto which the development traffic will be added, the Brief solely cites data sources including surveys undertaken during the height of the pandemic. This is an ongoing and present challenge, but it is essential to demonstrate that the data is fit for purpose i.e., it is inappropriate and inconsistent to assess one site (Stanmore) based on pre-pandemic traffic and the other (Tasley) based on suppressed traffic patterns during the current crisis.
16. The Brief makes no reference to future year highway network appraisal. This should pay due regard to background traffic growth and in particular make appropriate allowance for the inclusion of traffic generated and assigned to the local highway from committed development or other allocated Local Plan development, as well any relevant committed highway or transport infrastructure.
17. There is no transparency about the comparative geographical scope of study of the two sites. This is necessary to ensure that there is consistent rationale to the relevant scope of network to be appraised to avoid bias from under or over-representation of the local road network.
18. Highway impact in the Brief is based on a simplistic test of percentage change. As an output, percentage traffic change is a particularly inappropriate measure of relative impact. This is because it fails to account for existing operational performance; the potential for deliverable mitigation; and environmental sensitivity relating to the function of the road. In other words, the same percentage change in traffic flow on a congested residential road and a main through road, is liable to have very different environmental and policy significance. It is also a poorly suited approach to derive a measure of the overall effect of the sites in relation to the Community.

Recommendations

19. This Brief is not the tool to meaningfully evaluate the site short list but is suitable to use as a high level sifting exercise at perhaps a Call for Sites stage, whereby 30+ sites are to be whittled down to say, 5.



20. In comparative terms the Brief is unlikely to give a definitive conclusion; it may declare a winner, but potentially somewhat arbitrarily and subject to bias. To avoid subsequent challenge and to withstand scrutiny at Local Plan Inquiry review on soundness of the Plan, the Brief must be refashioned and significantly extended with purpose, objectives and means to identify the appropriate outcome for the Community (people, places, activity) in the context of adopted and emerging policy clearly stated. The current Brief meets none of these requirements.
21. The Brief should aim to identify the best outcome for the Community (people, places, activity) in the context of adopted and emerging policy. The current Brief does not allow this as the objectives have not been set from the outset.
22. This review is not advocating the development of a traffic (or transport) model however the level of appraisal should be proportionate and sufficient to understand the differences between the sites.
23. There are important locational considerations which will have a bearing on choice, but deliverability of each proposal is also important such that the teams promoting sites should have an opportunity to present their proposals against published objectives.

SKP\RJM\22546-01b Stanmore Brief TN

APPENDIX A

National Planning Policy Framework Extracts

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

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

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

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

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

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



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

APPENDIX B

SCC Local Transport Plan 4 – Briefing Note (December 2020)

6.4 Since LTP3 was produced in 2011, there have been several changes both at Shropshire Council and at wider national and regional levels. The strategic framework for transport is currently changing rapidly, for example:

- Shropshire Council declared a climate emergency in 2019 and set a target to be carbon neutral by 2030.
- Shropshire Council is due to submit a new Local Plan in 2021 which will prioritise and shape development in Shropshire up until 2026.
- The outcomes of Brexit may change patterns of freight and agricultural movements.
- Rapid innovation and adoption of smart technologies and digital communications.
- The ongoing Covid-19 pandemic has changed public perception of transport needs and enabled new questions to be asked about how transport will be used in the future. Whilst strong digital communications have prompted an unprecedented level of home-working and corresponding reductions in commuter-based travel movements, uncertainties around the use of public transport has not only resulted in more people choosing to walk or cycle but also an increase in pressure to use private cars to access work, education, shopping and leisure.

6.7 Previous LTPs have been developed using a transport mode-based approach. However, in reflection of this period of significant change in Shropshire, the next LTP will be developed using an alternative and future ready approach that considers and prioritises:

- People: The different characteristics of people that have an impact on their levels of accessibility i.e., age, gender, mobility, ethnicity etc. and the transport issues that they may experience.
- Places: The different spatial characteristics across the County in terms of urban and rural variations, the scale of settlements, connectivity within and between the towns and rural communities of Shropshire and external connectivity for international, national and regional movements.
- Activities: The different activities that people and organisations in Shropshire use transport and mobility to access or facilitate and how these needs may be changing. An understanding of the requirements for the movement of people and goods in Shropshire, now and in the future will be key.

Appendix 5 - Correspondance with Historic England on Hermitage Scheduled Monument (12 January 2021)

Appendix 4

HE letter 12 January 2021



Historic England

Our ref:
Your ref:

12 January 2021

FAO: Graeme Manton

Dear Sir,

**Re: Shropshire Local Plan
Statutory Consultation Responses from Historic England in respect of proposed
sites at Bridgnorth**

Thank you for your letter of 6th January addressed to my colleague Rosamund Worrall regarding Historic England's statutory consultation response to Shropshire Council's Regulation 18 Consultation on the Shropshire Local Plan Partial Review 2016-2038 and your request for clarification on certain matters.

With regard to the points you have specifically asked Historic England to address we have the following comments:

1. With regard to the our comments on the scale of the Stanmore proposals, the issue was not the issue of scale per se, but the cumulative impact of the scale of the proposed development through the main Stanmore allocation site, the adjoining safeguarded area to the north-east, and P56 on the Scheduled Monument and it's setting. Our conclusions were based on the information we had available at that time as part of the Plan process. Further information has since been made available and I refer to this below as set out in our response to Point 2.

In contrast, following consideration of the Local Plan Tasley site proposal and associated assessment information provided by Shropshire Council, we were satisfied that the impact on heritage assets could be dealt with adequately.



Historic England, Midlands Regions Group, The Axis, 10 Holliday Street, Birmingham, B1
1TF

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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





2. Historic England can confirm that the proposed land allocation commented on in our letter of 31st January 2019 is the initial proposal by Shropshire Council to their Preferred Sites Consultation which ran from November 2018 to February 2019. In this response we commented at a strategic level on the development proposals for Bridgnorth and were not therefore responding to your plans presented to Shropshire Council as part of the Regulation 18 consultation in 2018. Indeed, your Masterplan for Stanmore was only sent by the Council to Historic England on 17th November 2020, and we are now in a position to offer some further comments. Please refer to our response at point 4 below.
3. Again, our comments under point 2 are re-iterated, that Historic England was commenting at a strategic level on the development proposals for Bridgnorth.
4. Having now had chance to appraise the latest Masterplan for Stanmore, Historic England considers that it demonstrates that harm to the Scheduled Monument can be mitigated through the proposed provision of amenity/play space creating a buffer to The Hermitage. However, Historic England would be more comfortable with the Masterplan if the block of proposed low density housing were removed from between the amenity and play space block to its' north and the woodland and green infrastructure to its' south, and replaced with further green space, to create a buffer to The Hermitage all along the western boundary of the site and ensure a higher level of mitigation than that currently proposed.

We note that the Masterplan includes areas of 'Future Housing Post 2038'. For clarification, given the topography of the area, we consider that this will not impact on The Hermitage. In addition, on the basis of the intervening area of ancient woodland being retained, we consider that there would be limited impact from the 'Future Housing Post 2038' on other heritage assets, including Bridgnorth Castle, Bridgnorth Conservation Area and Listed Buildings within the town centre.

5. With regard to the Scheduled Monument Consent (SMC) to plough the field, the land in question is believed to have been cultivated previously, hence this was not a case where the form and structure of an undisturbed ground surface might provide a fine grained archaeological context to the use of the caves, and there is no reason to believe cut features or buried structural remains associated with the caves survive in the area in which consent for cultivation was granted. Since the significance of the monument was not likely to be harmed by the re-cultivation of this land Scheduled Monument consent was granted.

In contrast, our comments on the Plan were made on the basis that the site would be safeguarded for future development which would have a very different impact on a SM and its setting, than it being ploughed (notwithstanding my comments above). As such the advice provided for the consultation on the Local Plan is not at odds with that provided for the SMC since the proposals constitute very different entities.





Historic England

We hope that the above comments will assist your understanding of Historic England's position on the above matters. We will of course be making a formal response to the current Regulation 19 consultation and we also reserve the right to comment further, should any of the Council's proposals change.

Yours faithfully,

Elizabeth Boden

Elizabeth Boden (Mrs)
Historic Environment Planning Adviser



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Correspondence or information which you send us may therefore become publicly available.



Apley letter (RWorrell) 7 January 2021



APLEY ESTATE

The Old School
Norton
Nr Shifnal
Shropshire
TF11 9ED

Agent – G.C.J. Manton MRICS, FAAV

6th January 2021

Rosamund Worrall
Historic Environment Planning Advisor
Historic England
The Axis
10 Holliday Street
Birmingham
B1 1TF

By e-mail only to

Dear Ms Worrall

**Re: Shropshire Local Plan
Statutory Consultation responses from Historical England in respect of proposed sites at
Bridgnorth**

We write to request clarification of Historic England's statutory consultation response to the Regulation 18 Consultation on the above matters. As you will be aware there are two potential sites for significant new development at Bridgnorth over the period from now until 2038 with further land being safeguarded for subsequent plan periods.

The particular areas over which we are requesting your clarification relate to the following correspondence you have had with Shropshire Council – copies of the relevant correspondence is attached to this letter for ease of reference

1. You commented on the Stanmore site in your letter of 31st January 2019 saying that you objected to the inclusion of the P56 land and that in conjunction with the proposed P54 land and the land at Stanmore would to all intents form a development in competition with Bridgnorth itself. Further you said that based on the information available at the time that the proposal would cause substantial harm to the setting of the ancient monument.
2. By e-mail dated 30th September you said to Shropshire Council that you would "welcome the opportunity to discuss matters further ahead of the Reg 19 Consultation" and further in the same e-mail that "...we would welcome the opportunity to discuss the whether assessment information has been produced but not shown as part of the current evidence base at this time, and to discuss which sites are of particular concern to use (sic) at this time without such further assessment information."

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www.apleyfarmshop.co.uk

3. It seems that the meeting you were requesting did not take place as you were chased for a response by Shropshire Council on 15th October & responded very briefly on 23rd October saying that you had no objections to the Tasley proposal (BRD030) and noted that there is potential to affect the Grade2 listed building and the associated historic landscape character but that this is “clearly addressed in the proposed Development Guidelines set out in the Reg 18 pre-submission plan” and you also welcome the deletion of site P56 which is part of the Stanmore site.

The points we would ask you to address are:

1. You’ve objected to the overall scale of the Stanmore proposals but have no such objections to the overall scale of the Tasley proposal even though the Tasley proposal is nearly 50% larger in land take than (& much more visible in the landscape) than the Stanmore Proposal. Can you clarify why you have not raised an objection to the scale of the Tasley proposal.
2. Our plans as presented to the Council as part of the reg 18 Consultation do not include the majority of the P54 land as either development or as safeguarded land – have Shropshire Council not provided you with those plans. Please note that the proposed land allocation you appear to have commented on in your letter of 31st January 2019 is the initial proposal by Shropshire Council and does not reflect what was submitted as part of the original Reg 18 consultation nor the subsequent Reg 18 consultation which concluded at 30th September 2020.
3. You’ve said that you object to the harm to the setting of the ancient monument at the Hermitage which “will cause substantial harm to the setting of the monument”. This is at odds with comments by Historic England’s Inspector of Monuments who has said, on 3rd December & following a site visit, “ we have currently only commented on the high level strategic allocation documents but did not have any objection to the development in relation the Hermitage” and “we will be consulted again at the planning application stage but if the plans do not considerably change I do not think we would have any considerable objection
4. Your objections to the P56 proposal appear to have been made without sight of the documents we had submitted in September which detailed how the stand off from the woodland edge would be dealt with & how the additional stand off at the area closest to the monument would be dealt with. Did Shropshire Council not provide you with this documentation.
5. The Inspector of Monuments has also confirmed that you have given consent to plough the field “into the scheduled areas as we believe this would not cause harm to the significance of the monument”. This would seem to be at odds with your response that the proposal would “cause substantial harm to the setting of the ancient monument”. So can you clarify this point.

I also attach the correspondence with the Inspector of Monuments for ease of reference.

I trust you will find this to be in good order & would thank you for taking the time to deal with these enquiries.

Yours sincerely

Graeme Manton

Historic England Preferred Sites Representation



Historic England

WEST MIDLANDS OFFICE

Our ref: PL00179585

31 January 2019

Dear

SHROPSHIRE LOCAL PLAN REVIEW - PREFERRED SITES CONSULTATION

Thank you for the consultation on the above. Historic England would wish to submit the following comments in relation to general process matters and specific preferred sites:

General process comments

In terms of identifying preferred sites, paragraphs 1.22 and 1.23 advise of the assessment process for sites, and Para 1.23 point 3 sets out that heritage assessments have been undertaken. However, that information is not obvious from the evidence base information or the Sustainability Appraisal text and tables, and at present it is not clear how the historic environment has been considered. The NPPF (Para 185) requires that a positive approach to the historic environment is demonstrated as part of the Plan process and since this is not clear at this time it raises issues over the soundness of the document. As such, if heritage assessment work has been undertaken it would be worth considering setting this out in more detail in a heritage topic paper as part of the evidence base for the Plan, or incorporating the information into the next iteration of the SA. Such information may also help to address some concerns we have with regard to specific site allocations as set out below. We would be happy to discuss further in due course.

Issues relating to specific sites (proposed development allocations and proposed safeguarded land)

Historic England has considered the proposed preferred site allocations and the proposed safeguarded sites for future development identified through the Green Belt review. The latter has been considered in respect of our historic environment remit.

Bridgnorth:

Land at Stanmore - Historic England welcomes the Masterplan led approach to the development of the preferred sites identified at Land at Stanmore and would recommend that a criteria based policy is developed for the site as the Plan progresses to ensure that aims and aspirations for the site are clear to any future



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developer. We would recommend that any application should be accompanied by a heritage statement, and relevant assessments where appropriate, in order for heritage to inform the Masterplan at the outset.

Safeguarded site P56 - Historic England objects to the inclusion of this site as safeguarded land for future development. The changes in topography at this location would make the site extremely prominent as a feature and, in conjunction with the Land at Stanmore and the proposed safeguarded site at P54 would, to all intents, form a development almost in competition with Bridgnorth itself and which, based on the information available at this time, would cause substantial harm to the setting of The Hermitage Scheduled Monument, a rare rock cut form. We recommend that this site be deleted as safeguarded land and is retained as Green Belt land.

Ludlow:

Proposed employment site LUD052 - We have concerns about this site in terms of the longer term effects of cumulative impact to the east of the A49 on the setting of Caynham Camp. We recommend a criteria based policy approach to the site with a requirement for a low rise form of development at the site to take into account any impact on the setting of Caynham Camp. It may be that longer term a Local Development Order for the site may assist in terms of setting out what may be appropriate in relation to permitted development.

Market Drayton:

Proposed housing sites MDR012 and MDR034 - It is noted that the sites form part of the Market Drayton Neighbourhood Plan and the Masterplan led approach is welcomed. If the two housing sites as well as the existing and protected employment sites could be considered overall in relation to the potential marina development it would assist with wider connections for people and enhancement and enjoyment of heritage assets.

Hodnet:

Proposed housing sites HHH001 and HHH014 - From the information available it is not clear how the impact on the Hodnet Conservation Area has been considered and how the Council envisages development would take place in respect of the historic environment.

Knockin:



Proposed housing site KCK009 - From the information available it is not clear how the impact on the Conservation Area has been considered and how the Council envisages development would take place in respect of the historic environment.

Llanymynech:

Proposed housing site LYH007 - From the information available it is not clear how the impact on the Llanymynech Village and Heritage Area CA and nearby Scheduled Monument has been considered and how the Council envisages development would take place in respect of the historic environment.

Whittington:

Proposed housing site WHN024 - From the information available it is not clear how the impact on the setting of Gl Halston Hall and associated buildings has been considered in addition to impact on the Whittington Castle Scheduled Monument site or the Conservation Area, or how the Council envisages development would take place in respect of the historic environment.

Shifnal:

Proposed housing site SHF032 - We note that Table 18.38 sets out that any development scheme should take account of the setting of the listed buildings in the Aston Hall complex and also that approximate capacity of the site is indicated as 80 dwellings. From the information available it is not clear how the impact on the listed buildings at the Aston Hall complex have been considered and it is not clear how the indicated level of development could take place without causing harm to the setting of the heritage assets. On this basis we object to the proposed site at this time and recommend that a heritage impact assessment is undertaken to inform the consideration of the site as a preferred option.

Shrewsbury:

Proposed employment site SHR166 - Historic England objects to this site being allocated for development. At this point, Shrewsbury is contained to the west of the river which forms a strong physical boundary separating the town and the proposed employment site. There is potential for non-designated archaeology at the site which has been identified as the location of Uffington Roman Fort. In addition, development of the site has the potential to prejudice the setting of Haughmond Hill hill fort and Queen Eleanor's Bower, both Scheduled Monuments. Development of the site would



WEST MIDLANDS OFFICE

impede the experience of understanding the story of using higher areas for overlooking the lower plains. The villages and hamlets to the west of the river are read as individual nucleated settlements within a rural landscape. There is a strong demarcation between this landscape and the form of the town and development of the site would disrupt that.

Proposed housing site SHR216 - It is recommended that a criteria based policy applies to the site to ensure the design principles of the existing SUE are continued through the site.

Cross Houses:

Proposed housing site CSH004 - The reference to heritage assets in the associated text is noted and it is recommended that a criteria based policy is applied to the site to ensure the conservation or enhancement of those assets is carried through in any development proposal.

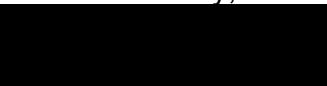
Prees:

Proposed housing site PPW025 - From the information available it is not clear how the impact on the Conservation Area and nearby Listed Buildings have been considered and how the Council envisages development would take place in respect of the historic environment.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We hope that these comments are of use at this time. We would welcome opportunity to discuss any of the issues raised in due course, and certainly ahead of the next consultation stage to establish whether concerns and objections can be addressed.

Yours sincerely,



Rosamund Worrall
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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

HE1 email – includes email of 30 September 2020

Dan Corden

From: Worrall, Rosamund
Sent: 23 October 2020 10:40
To: Joy Tetsill
Cc: Dan Corden
Subject: RE: Shropshire LPR: Historic England response to Reg 18 consultation

Hello Joy

Further to earlier email correspondence I can confirm that HE has no objection to the proposed allocation site at Tasley (BRD030). We note that there is potential to affect the GII Listed Buildings and associated historic landscape character but that this is clearly addressed in the proposed Development Guidelines set out in the Reg 18 pre-submission Plan.

The deletion of site P56 since the Preferred Options consultation is welcomed.

I hope this clarifies matters for Bridgnorth in relation to your deadline of this week.

Kind regards, Ros

From: Joy Tetsill
Sent: 15 October 2020 15:46
To: Worrall, Rosamund
Cc: Dan Corden
Subject: FW: Shropshire LPR: Historic England response to Reg 18 consultation

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Hello Ros

Thanks for your response to our Regulation 18 consultation.

We have some issues that we'd like to discuss with you as a matter of urgency. Would it be possible for my colleague Dan Corden and myself to meet with you (on MS Teams) next week? We're both free between 11am and 3pm on Monday and between 9.30 and 3pm Tues-THurs.

We need to decide which site allocation to pursue in Bridgnorth by the end of next week. If you remember, at Preferred Options we proposed a site at Stanmore to the east of the town which you were unhappy with because of its potential to affect the significance of The Hermitage SAM. See the Preferred Options consultation document at <https://shropshire.gov.uk/media/11266/00-preferred-sites-consultation-full-document.pdf> The Stanmore site is shown on page 52.

At Reg 18 we proposed a different site to the west of the town at Tasley which has the potential to affect some Grade II Listed Buildings (List Entry Numbers: 1294006 and 1367565). Your comments to our Reg 18 consultation (see below) do not appear to reflect this change in sites so we could do with knowing what you think about the Tasley site and whether you've had the opportunity to review the impact on the Scheduled Monument at the Stanmore site.

FYI the Reg 18 Plan can be found at <https://shropshire.gov.uk/media/15525/regulation-18-pre-submission-draft-of-the-shropshire-local-plan.pdf> and the Bridgnorth section starts at page 170. An interactive map of the sites is available at <https://shropshire.maps.arcgis.com/apps/webappviewer/index.html?id=2b46c765f00b489db6f64ece7b125ff8> and the Tasley site is BRD030.

You also re-iterate concerns about our site assessment process, so perhaps we could discuss these at the meeting as well. We have provided a description of our site assessment process at <https://shropshire.gov.uk/media/15538/sustainability-appraisal-environmental-report-regulation-18-pre-submission-draft-of-the-shropshire-local-plan.pdf> if this helps.

I'd be grateful if you could get back to me (or Dan if it's Friday as that's my non-working day) as soon as possible.

Best wishes

Joy Tetsill Bsc Msc AssocRTPI
Principal Planning Officer
Planning Policy Team,
Economic Growth, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury SY2 6ND

Working days Mon-Thurs (Thurs from home)

From: Worrall, Rosamund _____
Sent: 30 September 2020 17:01
To: Planning Policy <planningpolicy@Shropshire.gov.uk>
Subject: Historic England response to Draft LP Reg 18

Dear colleague,

Please accept our comments in respect of the draft Plan consultation. Formal letter to follow today.

Kind regards, Rosamund

PRE-SUBMISSION DRAFT SHROPSHIRE LOCAL PLAN 2016-2038 (REGULATION 18) CONSULTATION

Thank you for the consultation in respect of the above. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We would wish to submit the following comments on the draft Plan.

STRATEGIC POLICIES

Policy SP1: The Shropshire Test – Historic England welcomes the inclusion of the historic environment in this strategic policy.

Policy SP5: High Quality Design – Historic England welcomes the references to local character and historic interests, as well as building materials and detailing, included in this strategic policy which offers opportunity to conserve and enhance the historic environment.

Policy SP10: Shropshire Economic Growth Strategy - Historic England welcomes reference to the historic environment in this policy, particularly in terms of reference. The context of the policy offers potential opportunities for heritage led regeneration which could conserve and enhance the historic environment.

Policy SP13: Strategic Planning for Minerals – The reference to locally distinctive materials is noted and welcomed.

DEVELOPMENT MANAGEMENT POLICIES

Policy DP9: Strategic Corridors (Employment) - The inclusion of the historic environment in Criteria 4c is welcomed and we note would be supported by Policy DP24.

Policy DP10: Managing and Supporting Town Centres (Retail and Leisure) – The content of this policy is noted and would offer opportunities to conserve and enhance the historic environment including projects such as Oswestry High Street Heritage Action Zone.

Policy DP11: Tourism, Culture and Leisure – Reference to the historic environment within this policy is welcomed and offers opportunities to conserve and enhance the cultural and historic environment while linking with natural environment (including green and blue infrastructure) and well being elements too.

Policy DP17: Landscaping of New Development- The reference to heritage assets and setting in Criteria 3b is welcomed.

Policy DP18: Landscape and Visual Amenity – The reference to the Shropshire Landscape Typology within this policy is welcomed. We are aware that the typology includes historic landscape characterisation information.

Policy DP24: Conserving and Enhancing the Historic Environment – The inclusion of this policy is welcomed. The additional information on Heritage Assessment requirements set out in the explanatory text following the policy is clear, as are expectations set out in paras. 4.208 and 4.209.

DP25: Green Belt and Safeguarded Land – We would refer you to our previous comments in respect of the 2019 Strategic Sites consultation and historic environment elements and would welcome opportunity to discuss matters further ahead of the Regulation 19 consultation.

DP33: Managing Development and Operation of Mineral Sites – We note the minerals safeguarded areas and site allocations carried forward in DP32 and welcome the reference to the historic environment in Policy DP33 in respect of development proposal impacts and considerations.

SETTLEMENT POLICIES and STRATEGIC SETTLEMENT POLICIES

We refer to our consultation responses of 31 January 2019 and 9 September 2019 respectively in respect of the above policies. The draft Plan information refers to heritage assets within the text of the policies but it remains unclear how impact on the historic environment has been considered as part of the Plan process. On this basis it seems that the Plan puts forward a number of sites which, if developed, have the potential to affect the significance of one or more designated heritage assets in their vicinity.

Without clarity of any assessment of the degree of harm which the proposed site allocations might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, at present, the authority cannot demonstrate that the sites it is putting forward for possible development is compatible with the draft policies for the protection of the historic environment set out in the draft Plan or the requirements set out in the NPPF.

This seems to be a disconnect between the general positive approach to the historic environment set out in the Plan and we would welcome opportunity to discuss whether assessment information has been produced but not shown as part of the current evidence base at this time, and to discuss sites which are of particular concern to use at this time without such assessment information.

We will be pleased to discuss our response with you in due course and will continue to engage with the Council in respect of the draft Plan. Please do not hesitate to contact me should you wish to discuss any of the issues raised in the meantime.

Rosamund Worrall
Team Leader (Development Advice) (South)
Midlands Region

Historic England | The Axis
10 Holliday Street | Birmingham | B1 1TF

www.HistoricEngland.org.uk

Please note that due to pandemic restrictions I am working from home and can be contacted as per above.



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HE1 email – HE2 email – includes email 23 October 2020

Dan Corden

From: Worrall, Rosamund
Sent: 23 October 2020 12:01
To: Dan Corden
Cc: Joy Tetsill
Subject: Re: Shropshire LPR Historic Environment concerns: proposed meeting date and time

Hi Dan

Sorry in haste, yes that is correct in terms of P56 if it was to be included again moving forward.

I could do 2nd only the following week at a time to suit you both.

Best wishes, Ros

Sent from my iPhone

On 23 Oct 2020, at 11:52,

wrote:

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Hi Ros,

I understand the need to review the information in advance of the meeting, however unfortunately I am unavailable on Thursday next week and Joy is unavailable on the Friday. As such would Monday 2nd November or Tuesday 3rd November be appropriate? We can be relatively flexible to slot in around any other meetings you have on these dates.

Also, thank you for your comments in relation to our proposals in Bridgnorth. Can I assume from your statement regarding support for deletion of site P56 that you maintain your previous view with regard to this site as follows:

“Historic England objects to the inclusion of this site as safeguarded land for future development. The changes in topography at this location would make the site extremely prominent as a feature and, in conjunction with the Land at Stanmore and the proposed safeguarded site at P54 would, to all intents, form a development almost in competition with Bridgnorth itself and which, based on the information available at this time, would cause substantial harm to the setting of The Hermitage Scheduled Monument, a rare rock cut form. We recommend that this site be deleted as safeguarded land and is retained as Green Belt land”.

Thank you

Kind Regards

Daniel Corden
Planning Policy, Shropshire Council – Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND
Phone no:

Appendix 6 - Correspondance with Bus Operator

Sent: 28 January 2021 11:43

Subject: FW: Bridgnorth Proposed Development - Stanmore Garden Village

Hi Graeme,

I have attached a proposed timetable that would provide a 30 minute frequency from approximately 0700 – 1900 on Monday to Saturday and 0930 – 1830 on Sunday which would cover the shopping period making accessible travel for workers in retail and those using the bus for shopping etc:

The timetable as outlined can be provided with one bus and two drivers duties each day to cover the span of day.

I hope this covers the period of the day you were looking for along with creating links between the development, Low Town and High Town where connections can be made with other local bus services.

I look forward to discussing the project with you including costs to provide an agreed level of frequency.

Kind Regards

Keith

Sent: 22 January 2021 10:45

Subject: RE: Bridgnorth Proposed Development - Stanmore Garden Village

Dear Keith

Please find attached the layout drawing for phase 1

The first phase consists of 850 houses plus the school, village centre and green infrastructure, it also includes new business/employment areas as an extension to the existing Stanmore Business Park and adjacent to the A458/454 roundabout. The existing Stanmore Business Park has a number of business with around 1700 employees and there are existing houses – approx. 90 houses – between the new employment & new residential development.

In terms of frequency that is the sort of frequency I was thinking of by you guys are the experts in this sort of thing so if you think an alternative frequency would be preferable.

One point I should mention is that the parking at the village centre is designed to allow people to park & walk or use public transport to get into Bridgnorth Town centre (i.e there are more parking spaces) this is particularly relevant on a Saturday when there is a market in the High Street which reduces the number of parking spaces available in the town and is very popular. There is a current Saturday park & ride which runs from the Livestock market on the west

side of the town but its not well used because most of the visitors come from the east so they don't want to drive past the town to get to the park & ride

Hope this clarifies but let me know if you need anything further

Regards
Graeme

Sent: 07 January 2021 17:37

Subject: RE: Bridgnorth Proposed Development - Stanmore Garden Village

Hello Graeme,

Good to hear from you, I will provide clarification on a bus service between the proposed development and Bridgnorth.

Can you supply me with any drawings of the development site indicating road layout and the locations of type of residential build, local centre and business park. As a guide, would you be looking for a minimum daytime frequency of 30 minutes 0700 – 1900 Monday to Saturday and every 60 minutes Sunday 0900 – 1800?

I look forward to hearing from you.

Kind Regards

Keith

Sent: 07 January 2021 11:38

Subject: Bridgnorth Proposed Development - Stanmore Garden Village

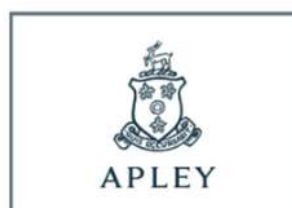
Dear Keith

You may remember we met last summer to look at the potential for a bus provision to serve our proposed development at Stanmore Garden Village, to re-cap the development includes 850 dwellings with a local centre on the eastern side of Bridgnorth on land located between the town and the Stanmore Business park. We've been asked to provide some further clarification on how a bus service could work and perhaps some indicative routing information. Would you be able to provide me with some further information that would help address these enquiries.

Many thanks

Graeme

Graeme Manton
Estate Director



Old School House, Village Road, Norton, Shifnal, Shropshire, TF11 9ED

Apley Estate – Goulburn Farms – Betchworth Estate





4-01 Concept masterplan diagram

Bridgnorth - Stanmore Garden Village

9A

Monday to Saturday

Bridgnorth, High Town - Sainsbury's	0715	0745	0815	0845	0915	0945	1015	1045	1115	1145	1215	1245	1315	1345	1415	1445	1515	1545	1615	1645	1715	1745	1815	1845
Bridgnorth, High Town - Harp Inn	0720	0750	0820	0850	0920	0950	1020	1050	1120	1150	1220	1250	1320	1350	1420	1450	1520	1550	1620	1650	1720	1750	1820	1850
Bridgnorth, Low town - Fosters Arms	0724	0754	0824	0854	0924	0954	1024	1054	1124	1154	1224	1254	1324	1354	1424	1454	1524	1554	1624	1654	1724	1754	1824	1854
Stanmore, Garden Village	0728	0758	0828	0858	0928	0958	1028	1058	1128	1158	1228	1258	1328	1358	1428	1458	1528	1558	1628	1658	1728	1758	1828	1858
Stanmore, Garden Village	0700	0730	0800	0830	0900	0930	1000	1030	1100	1130	1200	1230	1300	1330	1400	1430	1500	1530	1600	1630	1700	1730	1800	1830	1900
Bridgnorth, Low town - Falcon Hotel	0704	0734	0804	0834	0904	0934	1004	1034	1104	1134	1204	1234	1304	1334	1404	1434	1504	1534	1604	1634	1704	1734	1804	1834	1904
Bridgnorth, High Town - Sainsbury's - arr	0708	0738	0808	0838	0908	0938	1008	1038	1108	1138	1208	1238	1308	1338	1408	1438	1508	1538	1608	1638	1708	1738	1808	1838	1908
Bridgnorth, High Town - Sainsbury's - dep	0715	0745	0815	0845	0915	0945	1015	1045	1115	1145	1215	1245	1315	1345	1415	1445	1515	1545	1615	1645	1715	1745	1815	1845	1915
Bridgnorth, High Town - Harp Inn	0717	0747	0817	0847	0917	0947	1017	1047	1117	1147	1217	1247	1317	1347	1417	1447	1517	1547	1617	1647	1717	1747	1817	1847	1917

Sunday

Bridgnorth, High Town - Sainsbury's	0945	1015	1045	1115	1145	1215	1245	1315	1345	1415	1445	1515	1545	1615	1645	1715	1745	1815							
Bridgnorth, High Town - Harp Inn	0950	1020	1050	1120	1150	1220	1250	1320	1350	1420	1450	1520	1550	1620	1650	1720	1750	1820							
Bridgnorth, Low town - Fosters Arms	0954	1024	1054	1124	1154	1224	1254	1324	1354	1424	1454	1524	1554	1624	1654	1724	1754	1824							
Stanmore, Garden Village	0958	1028	1058	1128	1158	1228	1258	1328	1358	1428	1458	1528	1558	1628	1658	1728	1758	1828							
Stanmore, Garden Village	0930	1000	1030	1100	1130	1200	1230	1300	1330	1400	1430	1500	1530	1600	1630	1700	1730	1800							
Bridgnorth, Low town - Falcon Hotel	0934	1004	1034	1104	1134	1204	1234	1304	1334	1404	1434	1504	1534	1604	1634	1704	1734	1804							
Bridgnorth, High Town - Sainsbury's - arr	0938	1008	1038	1108	1138	1208	1238	1308	1338	1408	1438	1508	1538	1608	1638	1708	1738	1808							
Bridgnorth, High Town - Sainsbury's - dep	0945	1015	1045	1115	1145	1215	1245	1315	1345	1415	1445	1515	1545	1615	1645	1715	1745	1815							
Bridgnorth, High Town - Harp Inn	0947	1017	1047	1117	1147	1217	1247	1317	1347	1417	1447	1517	1547	1617	1647	1717	1747	1817							

Route:

Outbound:

Bridgnorth, High Town, Old Smithfield Road, High Street, West Castle Street, Castle Walk, New Road, Underhill Street, B4369, Low Town, Mill Street, a442, Cann Hall Road, Hospital Lane, Hospital Street, Stourbridge Road, A458, A454, Stanmore Garden Village.

Inbound:

Stanmore Garden Village, A454, A458, Stourbridge Road, Hospital Street, A442, Hospital Lane, St John Street, Low Town, Bridge Street, Underhill Street, Hollybush Road, Pound Street, Whitburn Street, Old Smithfield Road, Northgate, High Street.



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