

Appendix 1.

Taylor Wimpey

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Taylor Wimpey



Taylor Wimpey UK Limited is a dedicated homebuilding company with over 125 years' experience, we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 24 regional businesses in the UK give our operations significant scale and truly national geographic coverage.

Each business builds a range of products, from one bedroom apartments and starter homes to large detached family homes for every taste and budget and as a result, our property portfolio displays a surprising diversity. The core business of the company is the development for homes on the open market, although we are strongly committed to the provision of low cost social housing through predominantly partnerships with Local Authorities, Registered Social Landlords as well as a variety of Government bodies such as the Homes and Communities Agency.

With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction. Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey Strategic Land, a division of the UK business, is responsible for the promotion of future development opportunities, such as this site, through the planning system. The local business unit that will, in conjunction with Strategic Land, carry out housing and related development as part of this is Taylor Wimpey West Midlands based in Solihull.



**Taylor
Wimpey**

**Tasley
Garden Village,
Bridgnorth**

Development Statement

September 2020

Published by Taylor Wimpey UK Limited

APPENDIX 2 - SECTION 6 OF PREVIOUS REPRESENTATIONS (GREEN BELT)

6. GREEN BELT ASSESSMENT

- 6.1 **Although our client's land interests fall entirely outside the** Green Belt, the following provides our commentary on the Green Belt Stage 1 Assessment and Stage 2 Review carried out in respect of **the Council's Preferred Option for Bridgnorth in the form of the new 'Garden Settlement'**. Rather than provide separate comments on each document, given that the Preferred Option Garden Settlement sites have all been carried through to the Stage 2 Assessment, the following provides comment on the methodology and findings of both assessments.

Methodology

- 6.2 We provide no comment on the methodology of the Stage 1 assessment noting the strategic nature of the document.
- 6.3 In respect of the Stage 2 Review, no justification or explanation has been provided as to how the **'Opportunity Areas' have been identified and why they include**, or exclude, certain parcels of land and as such it is impossible to determine whether the Stage 2 Review methodology is appropriate. The only guidance on this issue is provided at Paragraph 3.2 of the review confirming that:

'29 Opportunity Areas were identified by Shropshire Council as broad locations to provided areas of search around established settlements and strategic corridors and locations'.

- 6.4 We would request that a methodology and explanation of how the Opportunity Areas have been identified is provided at the earliest opportunity. In the absence of such a methodology, the Stage 2 Review cannot be considered to be sound as an evidential basis to informs proposed Green Belt Release.

Part 2 – Parcel Assessments of Harm on the Green Belt Findings

- 6.5 The following sets out our commentary on the findings of the Stage 1 and Stage 2 documents. As the Garden Settlement parcel assessments from Stage 1 are largely reproduced within the Stage 2 Review at Part 2, the following provides commentary and makes reference to page numbers where appropriate within the Stage 2 Review document for ease of reference.

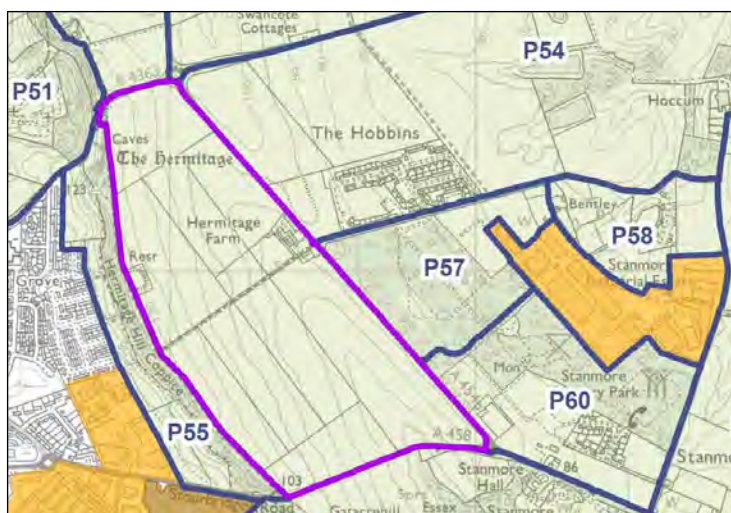
Parcel P56 (Appendix 3 – Pages 130-132)

- 6.6 We disagree with the conclusions reached within the assessment of Parcel 56 at Appendix 3 and consider that the release and development of this parcel would result in a High level of harm to the Green Belt in this local area rather than the moderate-high harm assumed within the Assessment.
- 6.7 At the outset we note that the sub-section entitled **'Harm to Green Belt Resulting from Release'** has significant errors of fact within stating that:

'the parcel is partially contained to the west and southeast by Stanmore Industrial Estate and Stanmore Country Park which would reduce the sense of encroachment on the wider countryside and level of harm to the Green Belt.'

- 6.8 Clearly from reviewing the Site plan, reproduced for ease of reference below as Figure 9, Stanmore Industrial Estate and the Country Park are located to the east **not the 'west and southeast'** of the parcel as stated in the conclusions. In addition, the Parcel is in no way 'contained by Stanmore Industrial Estate' which is located some 460m from the Parcel boundary. In this respect it is noteworthy that the assessment of parcel P57 confirms that: *'due to the presence of woodland there is a limited sense of urban encroachment within the parcel.'* Clearly given that Parcel P57 lies between P56 and Stanmore Industrial Estate, it is unclear as to how the assessment concludes that the impact of the industrial estate is greater on parcel P56 than the adjacent P57.

Figure 9 - Parcel P56 Site Plan



- 6.9 Whilst part of Stanmore Country Park is located to the east of the southernmost field of the parcel, the Country Park, as public open space, is by definition open and has very little urbanising characteristics other than a small well contained car park, located some distance from Parcel P56, and some small areas of hardstanding which now form paths through the country park which are **understood to be a legacy of the site's historic use as an RAF base**. As such the Parcel location, partly adjacent to the country park, will not reduce the impact on the sense of encroachment on the wider countryside as is suggested within the Stage 2 Review.
- 6.10 Figure 10 provide photographs taken from the western edge of Parcel 56 highlighting the openness of the parcel and countryside beyond, owing to the lack of urbanising development within or on the edge of the Parcel. Figure 10 also highlights the limited effect of the distant Stanmore Industrial Estate which is screened from the parcel by the Country Park and local topography. It should be noted that the images are taken in Winter (January 2019) and therefore further highlight that the woodland at the Country Park, and topography, screen the industrial estate from the highest point of the parcel even when the trees are not in leaf. In addition, the images demonstrate how the

Country Park does not have an urbanising effect on this or the adjacent parcel. Larger copies of these images are provided at Appendix 5.

Figure 10 - Views looking west from eastern boundary of P56



- 6.11 The conclusions reached in the assessment of Parcel 56 contradict the assessment made against Green Belt Purpose 3 which confirms that the parcel; ***'contains strong characteristics of countryside, has no urbanising development and is open'***, whilst the commentary in respect of the site's location confirms that it ***'forms part of a wide area of open countryside to the east'***. It is therefore unclear **as to how the conclusion that the site's release** from Green Belt would only amount to moderate-high levels of harm, given the significant harm to Purpose 3 that would be created as a result of the limited sense of encroachment into the Parcel or adjoining Parcels. It is concerning that there appear to be significant errors within the assessment of harm of this parcel in respect of the adjoining land and general site location which have presumably impacted on the overall conclusion.

Parcel P58 (Appendix 3 – Pages 136-138)

- 6.12 We disagree that the release of this Parcel would only amount to a moderate harm to the Green Belt and believe that, owing to the openness and relationship to the wider open countryside to the **north and east, the Parcel's release would result in Moderate-High** levels of harm.
- 6.13 It appears that the conclusions on the harm to the Green Belt are largely influenced by the Parcel being bound by Stanmore Industrial Estate to the south and south-west. However, much of the Industrial Estate is already screened from the Parcel by the local topography and existing woodland which limits the actual sense of encroachment into this Parcel. In addition, the site is open to the north and east and well related to the wider countryside. Driving along the country lane (Brook Lane) which forms this **parcel's northern** boundary provides very limited views of the Industrial Estate meaning that there is a genuine sense of being in the open countryside when travelling through the area.
- 6.14 Finally, we would also disagree that Brook Lane, which forms the northern boundary of the Parcel would form a more consistent and readily recognisable Green Belt boundary than the existing urban edge of Stanmore Industrial Estate. The road is restricted to a narrow single carriageway country

lane bound by hedgerows (see Figure 11) and as such it would form a weak Green Belt boundary to the north. In comparison, the current Green Belt boundary comprises the developed area and site boundary of Stanmore Industrial Estate with its significant areas of hardstanding and industrial buildings.

Figure 11 - Views of Lane forming Parcel P58's northern boundary



- 6.15 The NPPF (para. 139) confirms that when defining Green Belt boundaries, plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The current Green Belt boundary of an existing industrial estate is clearly a much more recognisable and significant boundary than would be formed if the new Green Belt boundary become the narrow country lane. In addition, the release of this boundary would weaken the Green Belt boundary to the east, with the parcel boundary currently made up of hedgerow, and farm track with a plantation beyond. This is compared to the current Green Belt boundary of the existing Industrial Estate. As such, the suggestion that the release of this parcel would create a more consistent and recognisable Green Belt boundary than the current industrial estate is unsubstantiated.

Part 3: Opportunity Areas – Assessment of Harm on the Green Belt

- 6.16 The following provides our commentary in respect of the assessment of Opportunity Areas around Bridgnorth as detailed within Appendix 2 of the Stage 2 Review.
- 6.17 At the outset, and before going on to comment on each of the identified Opportunity Areas, it is important that the assessment is flawed as evidence base to the Local Plan as the Opportunity Areas, and Sub-Opportunity Areas, identified within the Assessment assess the harm on the Green Belt as a result of draft Garden Settlement allocation identified within the Local Plan Review Preferred Option document. Whilst the Opportunity Areas and Sub-Opportunity Areas cover some of the parcels within the draft Garden Settlement allocation, the actual Preferred Option has not been assessed. This is a significant issue with the Stage 2 Review and as such the document cannot be considered to be a robust evidence base to support the Local Plan Review Preferred Option. We have provided further comment on this within Section 3 of these representations.

Opportunity Area Bn-1 (Appendix 3 – Pages 154-156)

- 6.18 This Opportunity Area covers Parcels P55 and P56 only. As per our commentary in respect of Parcel P56, we disagree with the suggestion that Stanmore Country Park and Stanmore Industrial Estate provide separation between Parcel P56 and the wider countryside given the level of screening and lack of urbanising features visible within, adjacent to, or from the Parcel.
- 6.19 Notwithstanding this, we agree with the conclusions regarding this Opportunity Area which would in a High level of harm to the Green Belt if it were to be released for development from the Green Belt. We also welcome the recognition that any development on the western edge of Parcel P56 would be highly visible from neighbouring areas of Green Belt given the local and wider topography.

Opportunity Area Bn-2 (Appendix 3 – Pages 157-159)

- 6.20 This Opportunity Area covers a number of parcels north of Stourbridge Road (A458) and south of Wolverhampton Road (A454) extending beyond Stanmore Industrial Estate. Our commentary of the individual Parcels within this Parcel (P56 and P58) are relevant to this assessment albeit we do not seek to repeat these comments here.
- 6.21 Overall, we agree with the conclusion that the release of this Opportunity Area would result in a High level of harm to the Green Belt.
- 6.22 In respect of Sub-Opportunity Area Bn-2a we consider that this option would have a Moderate-High level of harm to the Green Belt, rather than the suggested Moderate harm, given the openness and lack of encroachment the north and east of this Sub-Opportunity Area.

Opportunity Area Bn-3 (Appendix 3 – Pages 160-162)

- 6.23 This Opportunity Area covers all the individual Parcels assessed within Bridgnorth. Given the scale of the Opportunity Area and the inclusion of parcels which would result in high levels of harm such as Parcels P54 and P56, it is unsurprising that the assessment concludes that development in this Opportunity Area would result in a high level of harm to the Green Belt.
- 6.24 Sub-Opportunity Area Bn-3a largely replicates that assessed within Sub-Opportunity Bn-2a with the addition of Parcel P62 to the south of Bridgnorth Aluminium campus. Given the similarities with Bn-2a we would reiterate that the release of this Sub-Opportunity Area would amount to a Moderate-High level of harm to the Green Belt as per our commentary in respect of Bn-2a. The addition of another Parcel (P62) would not reduce the level of harm.

Summary

- 6.25 In summary, it is considered that there are a number of errors and flaws with the assessments of Parcels that form part of the draft Preferred Option Garden Settlement around Stanmore and as such the level of harm on the Green Belt, and the contribution some of the Parcels make to Green Belt purpose 3, has been underestimated.

- 6.26 The impact that Stanmore Industrial Estate and Stanmore Country Park have in containing and encroaching into Parcels 56 and 58 is overstated. Both parcels contain strong characteristics of countryside with little or no encroachment from urbanising development and are well related and connected to the wider open countryside. This is particularly the case for Parcel 56 which benefits from long range views across and from the wider Countryside.
- 6.27 Given this, the Stage 1 Assessment and Stage 2 Review do not form a robust and suitable evidence base to support the current Preferred Option. This is highlighted by the failure of the Stage 2 review to actually assess the Preferred Option through the identified Opportunity Areas meaning that the actual harm to the Green Belt of the Preferred Option has not been assessed.

APPENDIX 3 – ASSESSMENT OF THE HERITAGE IMPACT OF STANMORE GARDEN VILLAGE

Heritage Note

Proposed Stanmore Garden Village Site

REF: SB | P17-1934 | N0016v1 DATE: 29th January 2021

Introduction

1. This Heritage Note provides additional information relating to heritage matters at the proposed Stanmore Garden Village site to further support Shropshire Council's decision to include the alternative site at Tasley as the preferred location for a new garden village development in the Pre-Submission Draft Local Plan.
2. In the Council's *Summary of Assessment of Garden Village Proposals in Bridgnorth*¹, Council Officer's concluded in their report:

"Heritage - The land at the 'Garden Village' at Tasley contains several heritage assets, including two Grade II listed buildings. A Heritage Assessment provided by the Promoters indicates that less than substantial harm would arise to the significance of these designated heritage assets as a result of the changes that would occur to their settings. Because Sections 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests set out in Paragraphs 193, 194 and 196 of the Framework are therefore engaged, the Council is required to place great weight upon to their conservation. However, whilst this requirement is acknowledged, it is considered that through appropriate design and layout of development and incorporation of effective Green Infrastructure, impacts on these assets can be minimised. Further, it is considered that the significant public benefits of meeting the housing needs of Bridgnorth and its hinterland would outweigh the harm that would be caused to the significance of the listed buildings. Whilst it is also considered that the land at the 'Garden Village' at Stanmore 6 could mitigate impact on heritage assets, this is considered more challenging particularly in relation to the Hermitage Scheduled Monument – a designated heritage asset of the highest significance, given the location of this asset."

3. We concur with this conclusion for the reasons set out below.

Impact on the Hermitage

4. The Hermitage is a Scheduled Monument (List entry number 1004782) and is located within the proposed Stanmore Village site boundary. Scheduled Monuments are the oldest form of heritage protection given to Heritage Assets, pre-dating Listed Buildings, and as such represent the nations most long-established Heritage Assets. The Hermitage was Scheduled on the 5th December 1928.

¹ Shropshire Council Local Plan Review – Pre-submission Draft Local Plan Consultation -Appendix 2 – Bridgnorth Development Options Assessment as presented to Cabinet 20th July 2020

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5. Scheduled Monuments are identified based on following criteria set out by the Secretary of State for Digital, Culture, Media and Sport:
 - Period.
 - Rarity.
 - Documentation supporting the monument's significance.
 - Group value with other heritage assets.
 - Survival/condition.
 - Fragility/vulnerability – suggesting a need for protection.
 - Diversity of the attributes the monument holds.
 - Potential of the monument to tell us more about our past through archaeological investigation.

 6. The Schedule Description for the Hermitage refers to 500 hermitages' being known nationally from documents, but very few have ever been identified. The Hermitage is therefore a rare Heritage Asset, and certainly rarer than the Grade II Listed Buildings at the Tasley Garden Village site.

 7. Hermitages are categorised into 6 types. The Hermitage at Bridgnorth is a 'cave hermitage' and is identified as one of only two examples by Historic England in their publication *Hermitages – Introductions to Heritage Assets*². The Introduction to Heritage Asset (IHA) series of publications by Historic England are written usually to increase understanding of a Heritage Asset type where little has been written previously.

 8. Existing hermitages where they have been identified hold significant archaeological interest for evidence of past human activity that is worthy of expert investigation at some point. The fact that so few are identified, and little investigation appears to have been carried out on them further increases their significance.

 9. The IHA expounds on the location of hermitages, stating they "*would be carefully selected to provide the necessary environment, often for quiet contemplation on the physical and spiritual margins of medieval society.*"³

 10. Despite Bridgnorth town centre being less than 1km from the Hermitage, the Monument has retained a degree and sense of isolation since the Saxon period (when the Hermitage is thought to origin) and is still on the margins of society. This has been achieved though the retention of undeveloped land in the form of woodland, arable fields and the cemetery.

 11. Scheduled Monuments are considered by the NPPF to be assets of the highest significance. Paragraph 194 of the NPPF states:

² Historic England 2018 Hermitages: Introductions to Heritage Assets. Swindon. Historic England.

³ Ibid

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

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

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

12. The NPPF is clear that any development that is within the setting of a Scheduled Monument will require a clear and convincing justification and any substantial harm to them should be wholly exceptional.

13. The setting of Heritage Assets is defined in the NPPF as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral

14. It is also important to note that whilst a physical or visual connection between a heritage asset and its setting will often exist, it is not essential or determinative. This was recently considered in a High Court Judgement⁴ where it was concluded that:

“The term setting is not defined in purely visual terms in the NPPF which refers to the “surroundings in which a heritage asset is experienced”. The word “experienced” has a broad meaning, which is capable of extending beyond the purely visual”.

15. The concept of setting extending beyond the pure visual does not necessarily apply to all Heritage Assets but certainly does with the Hermitage. By definition hermitages were usually places that house religious individuals or groups seeking solitude and isolation.⁵ The approach and surrounds of a hermitage therefore is significant in order for it to be understood. For example, if one had to pass through extensive development and buildings to approach it, then the long-established sense of isolation and the original reason for its location will be lost to both current and future generations.

⁴ EWHC 1456, Steer v. Secretary of State for Communities and Local Government, Catesby Estates Limited, Amber Valley Borough Council, 2017.

⁵ Historic England 2018 Hermitages: Introductions to Heritage Assets. Swindon. Historic England.

16. Guidance published by Historic England⁶ provides an assessment checklist to assist in considering the experience of Heritage Assets and their setting. Included in the checklist of experience are,
 - Noise, vibration and other nuisances
 - Tranquillity, remoteness, 'wildness'
 - Sense of enclosure, seclusion, intimacy and privacy
 - Rarity of comparable survivals of setting.
17. These attributes of setting are applicable to the Hermitage where development within its setting would certainly detrimentally impact on how it is experienced.
18. Altering or changing its setting to become a more urban environment would create an entirely different hermitage type. Town hermitages (as opposed to cave hermitages) were less concerned with isolation and are evidenced from the 14th-century onwards. Any development within the setting of the Hermitage could therefore significantly change the historic meaning, understanding and experience of the Heritage Asset through loss of tranquillity, increase in noise, loss of remoteness and seclusion and loss of its long-established rural setting, which is not commonly experienced with this Heritage Asset type due to their rarity.
19. When allocating sites for development and where it is known that alternative sites would avoid any potential harm to a Heritage Asset of the highest significance, such as the Hermitage, then it is difficult for the Local Planning Authority to provide a clear and convincing justification for the allocation.
20. Guidance issued by Historic England⁷ advises on site selection methodology, stating that in determining whether a proposed site allocation is appropriate in light of the NPPF's test of soundness it "*should be justified in terms of any impacts on heritage assets, when **considered against reasonable alternative sites** and based on proportionate evidence.*" (our emphasis).
21. When considering the significance of the Hermitage as a Scheduled Monument of the highest significance in national planning policy terms, and that setting extends to beyond purely the visual, it is considered that the allocation of the site at Stanmore Village will be harmful to the significance of the Scheduled Monument through a change to its setting.
22. It is evident that in the need to place greatest weight on conserving Heritage Assets of the highest significance then the allocation of an alternative site, such as that at Tasley, where any harm to Heritage Assets is far less, is compliant with both the NPPF and current guidance.

Simon Britt MRTPI IHBC
Principal Heritage Consultant

⁶ Historic England, 2017 The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

⁷ Historic England 2015. The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3.

APPENDIX 4 – PEGASUS GROUP’S REVIEW OF TASLEY GARDEN VILLAGE AND STANMORE
GARDEN VILLAGE – LANDSCAPE AND VISUAL ISSUES REPORT (PREPARED BY ESP LTD)

REVIEW OF 'TASLEY GARDEN VILLAGE & STANMORE GARDEN VILLAGE - LANDSCAPE AND VISUAL ISSUES, A REVIEW FOR SHROPSHIRE COUNCIL, ESP LTD - NOVEMBER 2020'

February 2021

Introduction

1. This note comprises of a review of the document '**Tasley Garden Village & Stanmore Garden Village - Landscape and Visual Issues, A Review for Shropshire Council**', prepared on behalf of Shropshire Council by ESP Ltd in November 2020 [**'the ESP Review'**]. It has been prepared by Chartered Landscape Architects at Pegasus Group who prepared the Landscape and Visual Appraisal (LVA), September 2020, of the Tasley Garden Village proposal, which is one of the documents which the ESP Review considers.
2. This note primarily focuses on the comments made in relation to the LVA which was prepared for the Tasley site (sections 5 to 10 of the ESP Review). However, where relevant the note also briefly addresses the comments made in relation to the LVA produced by EDP Ltd for the Stanmore site (sections 11 to 15 of the ESP Review), this being the other main document which the ESP Review considers. Finally, the note also considers the conclusions represented at sections 16 to 18 of the ESP Review.

Observations on Introductory Sections 2 to 4 of the ESP Review

3. In paragraph 3.2 the ESP Review states that it has not considered effects of Green Belt, stating that it '*is not considered a factor in the assessment of landscape and visual effects*'. Whilst this statement it is not opposed from a landscape and visual perspective, it is important to remember that Tasley site lies outside the Green Belt and the Stanmore site lies within the Green Belt and that this is a material difference in terms of the overall planning context relating to the two sites.

Observations on Sections 5 to 10 of the ESP Review 'Tasley Garden Village - Landscape and Visual Appraisal (LVA)'

4. Throughout the review, ESP note the lack of detailed assessment within the LVA including the representation of photography to meet standards, however, it is acknowledged that this level of detail will be provided as part of a full landscape and visual impact assessment (LVIA) in support of an outline planning application. For the stage at which the project is currently at, it is not considered unreasonable or inappropriate for a less detailed LVA to be undertaken, rather than a full LVIA.
5. In paragraph 7.2, the suggestion of the potential to review the sensitivities set out in the Shropshire Landscape and Visual Sensitivity Assessment (SLVSS) in relation to the offset between the Tasley Garden Village site and the Oldbury Conservation Area is agreed. The ESP Review notes that this could lead to the reduction of sensitivity of Bridgnorth A (O2BDG-A) to the Tasley Garden Village site, because it does not include Oldbury Conservation Area or its surrounding land to the east of

Bridgnorth A (O2BDG-A), which are an important factor in raising the sensitivity of those parts of the character area nearer to Oldbury.

6. In response to the suggestion in paragraph 9.2 of the ESP Review that the LVA does not show a ZTV based on a bare earth model, it appears that this comment is erroneous because the September 2020 version of the LVA does in fact provide a bare earth ZTV plan, at its Figure 10. Such a ZTV based on a bare earth model would also be provided as part of the detailed LVIA that would accompany the outline planning application.
7. The comment in paragraph 10.1 of the ESP Review regarding the emerging layout that proposals for the Tasley Garden Village that ***'the layout looks appropriate to its surroundings and it integrates well with the existing site features such as the Listed Buildings, the public footpaths and the setting of Tiddle Brook'***, is welcomed.

Observations on Sections 11 to 15 of the ESP Review 'Stanmore Village - Landscape and Visual Appraisal'

8. It is noted that in this section of the ESP Review, observations are made regarding areas where ESP disagree with the position taken in the Stanmore LVA. Whilst no detailed assessment of the Stanmore site has been undertaken, the suggestions made by ESP regarding the Stanmore LVA appear to be reasonable.

Observations on Conclusions Sections 16 to 18 of the ESP Review

9. As discussed above, the matters raised in paragraph 16.1 in relation to the LVA for the Tasley site would be addressed in due course as part of the production of a full landscape and visual impact assessment (LVIA) in support of an outline planning application.
10. In paragraph 17.1, the ESP Review has picked up on and agrees with the point **raised in the separately prepared 'Landscape and Visual Review Of 'Stanmore Village' Proposal - September 2020'**, regarding the landscape sensitivity of the Stanmore site. The findings of the ESP Review that for the Stanmore site ***'the assessment in the LVA of landscape sensitivity for the site should be increased from medium to medium-high, based on the judgements and narration set out in the SLVSS'*** is agreed.
11. The observations set out in paragraph 18.1 of the ESP Review that residents occupying listed buildings do not have an enhanced visual sensitivity and there is not extensive visibility of the Tasley site from the elevated land to the south west, are agreed and welcomed.

Conclusions

12. Overall, it is considered that the ESP Review is generally a helpful document in considering the landscape and visual issues relevant to the Tasley Garden Village proposal. For the stage at which the project is currently at, it is not considered unreasonable or inappropriate for a less detailed LVA to be undertaken, rather than a full landscape and visual impact assessment (LVIA). However, nonetheless, the matters raised regarding methodology in relation to the current LVA for the Tasley site would be addressed in due course as part of the production of a full LVIA in support of an outline planning application.
13. It is also noted that the ESP Review has picked up on and agrees with the point **raised in the separately prepared 'Landscape and Visual Review Of 'Stanmore Village' Proposal - September 2020', regarding the landscape sensitivity of the Stanmore site.** The findings of the ESP Review that for the Stanmore site *'the assessment in the LVA of landscape sensitivity for the site should be increased from medium to medium-high, based on the judgements and narration set out in the SLVSS'* is agreed. By contrast, it is welcomed that the ESP Review suggests that due to the offset between the Tasley Garden Village site and the Oldbury Conservation Area or its surrounding land, the sensitivity of Bridgnorth A (02BDG-A) character area in the vicinity of the Tasley Garden Village site may be reduced.
14. Finally, it is noted and welcomed that the ESP Review agrees that residents occupying listed buildings do not have an enhanced visual sensitivity and there is not extensive visibility of the Tasley site from the elevated land to the south west.

APPENDIX 5 – SECTION 9 OF PREVIOUS REPRESENTATIONS (SUSTAINABILITY APPRAISAL)

9. SUSTAINABILITY APPRAISAL (JULY 2020)

- 9.1 The Sustainability Appraisal process and a separate site assessment process have been conflated into a single document, the Sustainability Appraisal and Site Assessments Environmental Report (July 2020). The following provides comment on this.

Methodology

- 9.2 Taylor Wimpey some concerns with the methodology of Sustainability Appraisal which are raised with a view to ensuring that the Sustainability Appraisal is robust.

- 9.3 Firstly, it omits the SAMDev Plan allocations that are proposed to be retained as allocations in the Regulation 18 Local Plan. As such, the Council may be criticised for not being able to compare these allocations with the sites in the Sustainability Appraisal. Whilst it is recognised that the SAMDev Plan allocations underwent a Sustainability Appraisal at the time of that plan, different assessment criteria was used and it is safe to say that the spatial context within which the sites were considered will have changed since then. A failure to consider the SAMDev Plan allocations may be a significant oversight on the basis that the PPG requires Sustainability Appraisals to develop Local Plan options including reasonable alternatives and evaluate the likely effects of the Local Plan and alternatives⁹.

- 9.4 Secondly, the scoring criteria for the Sustainability Appraisal utilises a distance of 480m as the average distance walked in 10 minutes, to ascertain the accessibility of a site. This distance is **derived from the Council's Open Space, Sports & Recreation Interim Planning Guidance (September 2010)¹⁰. The main issue is that PPG17, on which the Council's guidance is based, does not reference** this distance and in event has long since been revoked. A distance of 800m is the normal proxy for a 10 minute walk as established by reputable and much utilised sources¹¹. As such, the use of the 480m distance is not justified and the use of an 800m distance in the Sustainability Appraisal instead could prevent unnecessary scrutiny at submission and examination.

- 9.5 In any case, it is unclear as to how these measurements have been taken and whether this is a **walking distance measurement or a simple point to point 'as the crow flies' measurement**. From a review of the scoring of some of the sites it appears that the measurement is a point to point measure. It is recommended that this is confirmed within the methodology.

Stage 2a – Sustainability of Sites

- 9.6 It is set out in the document that the Sustainability Appraisal represents Stage 2a of the site assessment process¹². The Sustainability Appraisal for the sites in Bridgnorth is set out in Appendix D of the document.

⁹ Paragraph: 013 Reference ID: 11-013-20140306

¹⁰ Referred to as the Council's PPG17 Study in the Sustainability Appraisal

¹¹ Building Sustainable Transport into New Developments (DfT, 2008), Planning for Walking (CIHT, 2015), Guidance for Outdoor Sport and Play Beyond the Six Acres Standard (Fields in Trust, undated)

¹² Stage 1 of the site selection process being the consideration of sites in the SLAA

9.7 Stage 2a: housing sets out each of the criteria 1-15, a description of the criteria, a guide to the scoring and then a score for all the sites assessed around Bridgnorth. Below, we provide comments on the scoring which has been provided for the Tasley Garden Village Site (BRD030).

Tasley Garden Village BRD030

9.8 We have a number of concerns with the scoring given for site BRD030 within Appendix D, which do not appear to fit with the methodology set out in the Sustainability Appraisal. We provide comment on this in turn.

9.9 Criterion 3 relates to tree preservation orders (TPO). The assessment of BRD030 suggests that a TPO is present within the site however we are not aware of any such TPO whilst the presence of a TPO is not raised or mentioned within the Stage 3 Site Assessment with no specific constraints **noted within the 'Tree comments' heading**. As such, there may be an error in respect of this criterion.

9.10 Criterion 5 relates to the proximity of the site boundary to a range of different services and facilities however we have some concerns with the scoring process in respect of BRD030 for a number of services/facilities. As set out in the methodology, the services and facilities must be located within 480m of the site boundary to achieve a plus score (+) and those services which are not located within 480m of the site boundary will gain a minus score (-). As already highlighted it is not stated how this 480m has been calculated however it appears that this is a point **to point 'as the crow flies' measurement having reviewed the scoring for other sites**.

9.11 In terms of access to a primary school, BRD030 has been given a minus score which we consider to be incorrect. As noted within the criteria, the primary school must be located within 480m of the site boundary to gain a positive score (+). As shown in Figure 8, the site boundary of BRD030 is located approximately 448m from the nearest primary school (Castlefields Primary school) which can be accessed within a 10 minute walk. As such, the scoring for accessibility to this service should be corrected.

Figure 3 – Distance from the site boundary to Castlefields Primary School



9.12 Similarly, we consider the score to be incorrect for accessibility to a children’s playground. This is only relevant to the scoring for housing as this criteria was excluded for the employment sites. **There is a children’s playground located to the north of the site within the Wenlock Rise residential development beyond the A458 which is located approximately 385m from the boundary of the site as illustrated at Figure 9.**

Figure 4 – Distance from the site boundary to a children’s playground



9.13 Based on the comments provided, and notwithstanding the commentary provided in respect of the TPO, two of the previous negative scores (access to primary school and playground) should have been positive we consider the site should have scored -6, which is considered to be **'Fair'** for housing as opposed to a score of -10. For employment, the site should have scored -6, which is still considered to be **'Fair'**. For completeness, we ask that the scoring is amended to ensure that BRD030 is considered in line with the methodology set out.

9.14 It is worth noting that although Tasley Garden Village scores **'Poor'** in comparison to some other sites which were assessed in the Sustainability Appraisal around Bridgnorth, the majority of the sites which score better than Tasley Garden Village are small sites which are located within or on the edge of Bridgnorth. Some of these sites did not make it to Stage 3, as they are considered to be too small (less than 0.5 hectares). Tasley Garden Village measures approximately 119 hectares and therefore it is likely that it may score lower than other smaller sites which are not capable of accommodating the settlements future housing and employment needs.

Stage 2b – Screening of Sites

9.15 It is set out in the document that the screening of sites represents Stage 2b of the site assessment process. This is presented as series of proformas for each site. The proformas include a summary of the findings of the SLAA and an overview of the suitability, availability and achievability of the site with a recommendation on whether it should considered in the next stage of the process.

- 9.16 BRD030 is recommended to be considered at the next stage. We have no comments to make on the screening of BRD030 as part of Stage 2b.

Stage 3 – Detailed Site Review

- 9.17 The Detailed Assessment of Sites represent Stage 3 of the site assessment process. This is again presented as a series of proformas for those sites which were taken forward from Stage 2b. The proformas includes a summary of the strategic considerations for each site and officer commentary on highways, ecology, trees and public protection. Ultimately, it is recommended that the site is allocated as a sustainable extension of Bridgnorth. It is also recommended that part of the site is identified as a future direction for growth.
- 9.18 Taylor Wimpey fully support these findings. The site can deliver a sustainable urban extension to address the housing and employment needs of Bridgnorth. We agree overall with the comments provided however we have some minor additional comments to make on some of the individual considerations.

Highways Accessibility Rating

- 9.19 It is not clear within the main report or the appendices why some sites have been scored a highways accessibility rating and others have not. BRD030 has not been provided with a rating and the report does not suggest how this would be scored and what would be considered a good score where the site has good accessibility and what would be considered a poor score with poor highways accessibility.

Heritage

- 9.20 In terms of the heritage comments provided, it is noted that given the size of the site, it may have archaeological potential. A Heritage Desk Based (HDB) Assessment has been prepared in support of the allocation of Tasley Garden Village. The potential for archaeological remains of; prehistoric date, Iron Age to Romano-British age or medieval date it considered to be low.
- 9.21 As part of the HDB assessment, an assessment of the harm to the two listed buildings as a result of the development was carried out. The two listed buildings comprise: the Leasowes and the former farmhouse at the Leasowes. The level of harm to both heritage assets has been categorised as *less than substantial harm, at the lower end of the spectrum*, and such harm should be weighed alongside the public benefits of the development proposals.

Public Protection Comments

- 9.22 A Phase 1 Geo-Environmental Assessment has been prepared in support of the allocation which has identified that the site was historically and currently remains agricultural fields with 9no infilled former ponds and 2no farms. Potential contamination sources are anticipated to be extremely limited or absent for the majority of the site. Should there be a contamination issues, there are

likely to be very localised sections of the site, namely the infilled ponds, farms and land adjacent to the old clay pit in the north west of the site. Further work would be carried out as part of a future planning application.