



REPRESENTATIONS TO REGULATION 19: PRE-SUBMISSION DRAFT OF THE SHROPSHIRE LOCAL PLAN 2016 TO 2038

TASLEY GARDEN VILLAGE

TAYLOR WIMPEY UK LTD

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1. INTRODUCTION

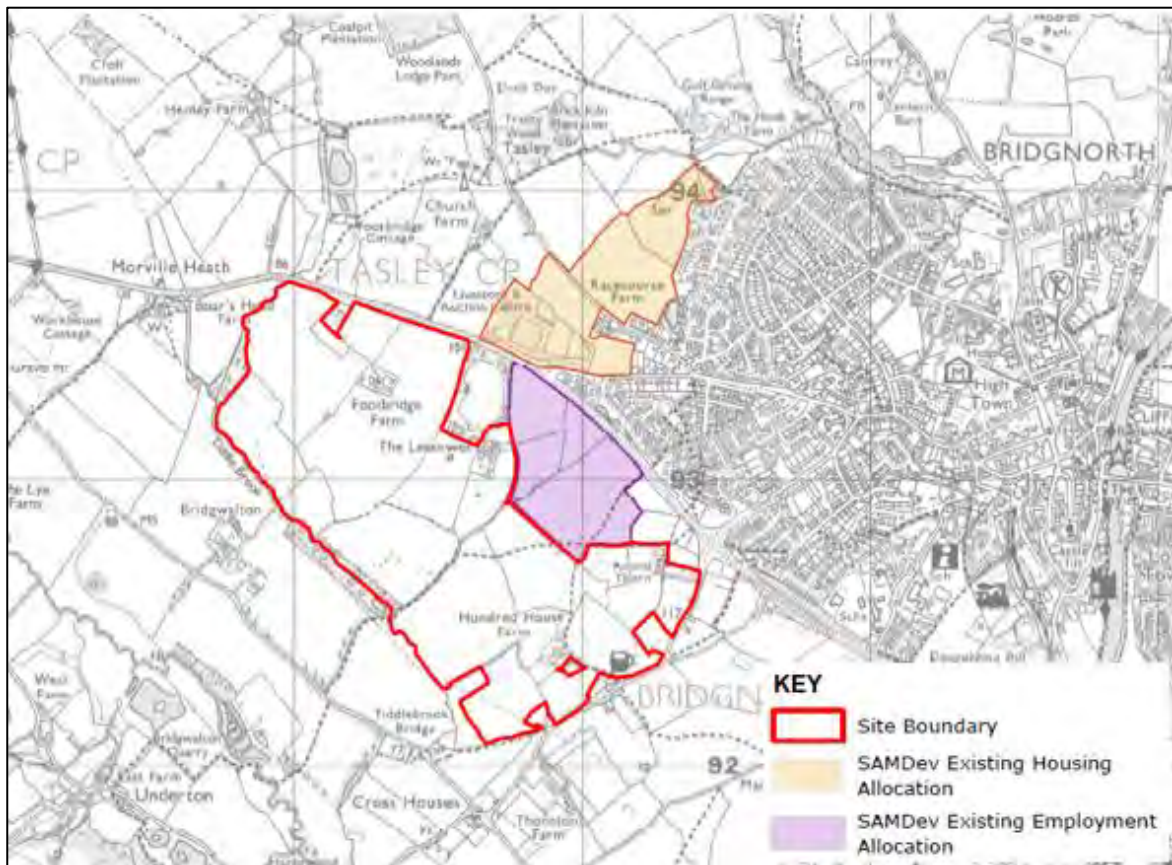
- 1.1 Pegasus Group is instructed by Taylor Wimpey UK Ltd (Taylor Wimpey) to make representations to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 (**“the Draft Local Plan”**).
- 1.2 **These representations are submitted in respect of our client’s land interests at Bridgnorth** which are located to the south west of the town and adjoining the existing employment allocations at Tasley, the A458 and Ludlow Road (B4364). Full details of the proposed development of the site are set out in the Vision Document provided at Appendix 1 of these representations.
- 1.3 **Taylor Wimpey UK Ltd is a dedicated homebuilding company with over 125 years’ experience and an unparalleled record in the industry.** They have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure. With unrivalled experience of building homes and communities, Taylor Wimpey continues to be at the forefront of the industry in building quality and design and has significant experience delivering schemes such as Tasley Garden Village.
- 1.4 This document provides our representation on the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan Document (2016 to 2038) and the suite of evidence base documents published for consultation.
- 1.5 Within these representations, we will make comments on the soundness of the plan, as per the requirements stated in paragraph 35 of the NPPF. This confirms that plans can be considered to be **‘sound’ if they are: positively prepared, justified, effective and consistent with national policy.** Where we do not consider the policy to be sound, we will provide commentary as to how the policy should be amended so that it can be considered sound.
- 1.6 The representations makes comments on the consultation document and evidence base in the following order/headings:
- Section 2 provides comments on the Strategic policies within the Local Plan Review Document;
 - Section 3 provides comments on the Development Management Policies in the Local Plan Review Document;
 - Section 4 looks specifically at the Bridgnorth Place Plan Area policy;
 - Section 5 comprises a review of the Bridgnorth Development Options Assessment and comparison between Tasley Garden Village and Stanmore Garden Village;
 - Sections 6 to 8 reviews some of the evidence base documents, including: Green Belt Exceptional Circumstances Statement, Review of Landscape Issues for Tasley Garden Village/Stanmore Garden Village and Sustainability Appraisal; and

- Section 9 concludes the main points raised within the representations.

The Site

- 1.7 The site comprises 119 hectares of open countryside/agricultural land which abuts the south western edge of Bridgnorth, see Figure 1. The site is surrounded by open countryside to the west and south. The A458 and SAMDev employment allocations (ELR011/a and ELR011/b) are located to the north and Ludlow Road (B4364) to the east. The western and southern boundaries are formed by Tiddle Brook.

Figure 1 – Site Location Plan



- 1.8 There are four existing farmsteads within the site: Roundthorn Farm to the east, The Leasowes in the centre of the site, Footbridge Farm to west and Hundred House farm to the south. There are two Grade II listed buildings within or adjacent to the site (the Leasowes and the former farmhouse at the Leasowes). The former farmhouse at the Leasowes is located within the site boundary and the Leasowes is located adjacent to, but not within, the site boundary. These buildings would be retained and development offset from these listed buildings.
- 1.9 Located approximately 200m to the south of the southern boundary is an active sand and gravel quarry known as Bridgwalton Quarry. Located approximately 450m to the west of the western boundary is an active sand and gravel quarry known as Morville Quarry. The site extension is

proposed to abut the dense wooded area along the western boundary. This was proposed as part of the SAMDev plan and is retained in the draft Local Plan.

- 1.10 The site comprises a mix of Flood Zones 1, 2 and 3. The majority of the site is located in Flood Zone 1. Based on the Environment Agency Flood Risk Map, there are some areas of Flood Zones 2 and 3 located along the southern and western boundaries where Tiddle Brook flows. The Flood Zone 2 and 3 areas are mainly located along the site boundary but extends into the existing agricultural fields in some locations, particularly to the south western corner of the site. However, it is thought that the flood risk zones associated with Tiddle Brook are not accurately reported and the flood risk has been over estimated.
- 1.11 **The site is not located within a Conservation Area or SSSI. The closest SSSI's are located approximately 1.35km (Devil's Hole Morville) to the west of the site and approximately 1.5km to the south of the site (Thatchers Wood and Westwood Covert).**

Promoted Development

- 1.12 The overarching vision for Tasley Garden Village is to deliver a high quality development underpinned by Garden City Principles that delivers new homes, employment development and new facilities and services capable of meeting the needs of the Garden Village residents and existing Bridgnorth population. Tasley Garden Village will provide:
- The delivery of 1,050 new homes, phased over the plan period which will comprise of a mix of type, size and tenure to meet the housing needs of the town, including affordable housing;
 - 16 hectares of employment land, which will be delivered in a gateway location and will primarily be targeted towards office and research uses;
 - A new local centre which will provide a range of retail and community uses, including a community centre;
 - 2 hectares of land to deliver a new primary school;
 - A medical centre (should a need be identified);
 - 20 hectares of green infrastructure throughout the site to create green links to the existing residential areas to the north of the site and the open countryside beyond the site;
 - 19 hectares Country Park area which will provide enhanced natural habitats and additional areas of recreation;
 - Extensive planting and landscaping throughout and around the site;
 - Pedestrian and cycle links both within and around the site to encourage sustainable modes of transport, including a footbridge to cross the A458; and,
 - The potential to deliver a park and ride.

2. STRATEGIC POLICIES

- 2.1 This Section provides comment on some of the strategic policies in the draft Local Plan where relevant to Bridgnorth and/or the proposed Tasley Garden Village site.

SP1. The Shropshire Test

- 2.2 Taylor Wimpey fully support the overarching vision of the County which is set out in this policy. The policy recognises that development will need to contribute to meeting local needs and make settlements more sustainable with the right mix of housing, employment, and other types of development. We considered this policy to be consistent with national policy, justified and effective and therefore sound.

SP2. Strategic Approach

- 2.3 Taylor Wimpey support the overarching vision and proposals to deliver 1,400 dwellings per annum over the plan period recognising the need to deliver sufficient levels of affordable housing whilst maintaining and enhancing the role of principal and key centres such as Bridgnorth. Such an approach is therefore considered justified and accords with national policy recognising that the standard method of calculating housing need must be treated as a minimum figure.

SP3. Climate Change

- 2.4 Taylor Wimpey supports the aims of this policy and the transition towards a zero-carbon economy. The policy recognises the need to minimise travel and maximise the ability to make trips via sustainable modes of transport. As such, we consider this policy to be positively prepared and consistent with national policy. The policy is therefore considered to be sound.

SP4. Sustainable Development

- 2.5 **Taylor Wimpey endorses the Council's commitment to taking a positive approach to sustainable development.** This policy accords with paragraph 11 of the NPPF and is considered to be sound.

SP5. High-Quality Design

- 2.6 As previously noted, Taylor Wimpey supports the aims and objectives of this draft policy and the delivery of new high quality developments to ensure the creation of better places to live and work.

- 2.7 We would however like to reiterate the comments we made in our previous representations in respect of Part 2 of the policy which notes that developments must be in line with the design principles set out within the West Midlands Design Charter. Taylor Wimpey believe it would be more effective and justified for developments to comply with specific design guidance which relates to Shropshire in particular, as opposed to a design charter which has been produced for the whole County. A Shropshire specific design charter would ensure that the design principles are grounded **in an understanding of the County's defining characteristics but would also reflect the nuances and particulars in Shropshire** which are not relevant to all of the West Midlands.

2.8 To ensure this policy is effective, we recommend that this policy is amended to remove the reference to the West Midlands Design Charter. Should the Council feel it is necessary, a specific Design Guide for Shropshire could be prepared or such matters could also be dealt with through **any site specific SPD's produced for planned** strategic developments such as Tasley Garden Village.

SP6. Health and Well-Being

2.9 Taylor Wimpey supports the need for new development to ensure the health and well-being of individuals, communities and place. However, we have some concerns with Part 8 of this policy **which makes reference to the Council's Air Quality Action Plans. Although we recognise that an Air Quality Annual Status Report** was published in December 2020, setting out the main air quality issues within the borough, specific action plans have yet to be prepared.

2.10 With regards to Bridgnorth, a draft Air Quality Action Plan for Bridgnorth was published in March 2008 however this is almost 13 years old and we would question as to how relevant this remains. For this policy to be considered sound a timeline as to when the Action Plans will be prepared should be provided, with this being published in line with, or prior to the adoption of the Local Plan Review.

SP11. Green Belt and Safeguarded Land

2.11 As per the Regulation 18 draft of the Local Plan Review, 11.4 hectares of land is proposed to be released from the Green Belt in Bridgnorth for employment development. This land is located adjacent to the existing industrial estate at Stanmore. As set out in our previous representations, to the Regulation 18 draft of the Local Plan Review, Taylor Wimpey is concerned that very special circumstances do not exist to support the draft allocations at Stanmore. As noted in paragraph 137 of the NPPF, Green Belt boundaries should only be altered when all other reasonable options for meeting its identified need for development have been explored and there are no other reasonable alternatives. This is not the case in Bridgnorth and therefore the policy is not considered to be consistent with national policy.

2.12 This plan allocates Tasley Garden Village as a sustainable location for the delivery of housing and employment needs in Bridgnorth. The site is located within the open countryside, in close proximity to existing services and facilities within Bridgnorth and is located adjacent to the housing and employment SAMDev allocations. The site is unconstrained and therefore is a suitable site to deliver the future housing and employment needs for Bridgnorth. The site also has additional land which is capable of accommodating the future growth well beyond the plan period, as identified through the draft plan.

2.13 In light of this, there is no need to allocate Green Belt land in Bridgnorth, either for development within the plan period or post plan period. As such, the policy is not considered to be consistent with national policy or justified and therefore is considered to be unsound. We comment further on this matter in respect of draft Policy S3.

SP12. Shropshire Economic Growth Strategy

- 2.14 Taylor Wimpey fully supports the aims and objectives of this policy and the importance of a clear vision and strategy to encourage economic growth. We welcome the additional text which has been added in Part 2 of this policy which notes the spatial strategy will take into account the special considerations in the Green Belt, Areas of Outstanding Natural Beauty and the need to protect and improve areas of higher landscape value and then natural and historic environment. This approach is considered justified and accords with national policy.
- 2.15 As previously noted, Bridgnorth is well located to deliver and support a significant proportion of economic growth, particularly around the proposed Tasley Garden Village. Taylor Wimpey supports the recognition within this policy that there is a need to deliver housing of the right type and in the right locations to support economic growth and employment development.

SP13. Delivering Sustainable Economic Growth and Enterprise

- 2.16 Taylor Wimpey support the level of employment development planned to be delivered within **Shropshire which recognises the economic potential of Shropshire and the Council's clear growth aspirations**. This level of growth is, in part, justified through the Shropshire Employment Land Review which recognises the role that Bridgnorth can play in delivering economic growth and the support for Bridgnorth fulfilling its roles as the second Principal Centre in the County. Whilst the Employment Review did not specifically consider the delivery of employment development at Tasley Garden Village, as it pre-dates the consideration of Tasley Garden Village, the Employment Land Review clearly recognises the potential of land in this location to deliver employment development stating that:

'The existing employment [SAMDev] allocations in the central part of Area 4 are also a real opportunity which given their siting adjacent to the road and the key gateway junction on the A458 is an obvious location to accommodate new employment development. It could accommodate relocated employment uses from the existing Livestock Market across the A458 (a current housing allocation) and for development of new employment uses. Its strategic location would be attractive to the local market given its visibility to the highway and edge of town location with good accessibility. This could also open up the other adjacent plots as part of a long term vision as an employment corridor.' [our emphasis]

- 2.17 Given the above, the proposed approach is considered to be justified.

SP14. Strategic Growth Corridor

- 2.18 Taylor Wimpey **support the identification of the 'Eastern Belt' Strategic Corridor which includes the A458 and Bridgnorth**. Such an approach is justified as set out in relation to Policy SP14.

3. DEVELOPMENT MANAGEMENT POLICIES

3.1 This part of the representations provide comment on some of the development management policies in the draft Regulation 19 Local Plan.

DP1. Residential Mix

3.2 As per the previous comments to the Regulation 18 draft of the Local Plan, Taylor Wimpey supports the aims of the policy and the need to provide a mix of homes that meet local needs. However, to ensure that the policy is positively prepared, effective and justified, Part 1 of this draft policy needs to offer more flexibility to account for the changing requirements in housing needs over the plan period. Taylor Wimpey agree that the size, type and tenure of new residential dwellings should have regard to the **Shropshire Council's Strategic Housing Market Assessment (SHMA)** however this requirement should only apply where the SHMA is updated on a regular basis. If the SHMA is out-of-date, it will not reflect the needs of the County and the individual settlements and therefore would be not considered to be sound. We ask that the policy text is updated to state; **'in accordance with an up to date SHMA'** to ensure that it remains effective in addressing local housing needs.

3.3 Furthermore, to ensure there is sufficient flexibility within the policy to meet local needs, we ask that the policy is amended to account for localised and site specific evidence to support a departure from the district wide requirements set out in the SHMA. Flexibility within this policy is of utmost importance to ensure that the delivery of housing is not frustrated as a result of an overly prescriptive policy, or a policy which does not reflect the specific needs of the distinct settlements within Shropshire.

3.4 With regards to Part 2, we welcome the clarification provided by the Council as to when a Local Housing Need Survey would be applicable and further details where a Local Housing Need Survey has not been produced within the last 5 years. Taylor Wimpey also endorse clarification provided with regards to an equivalent survey. Such an approach is considered appropriate and effective in ensuring proposed development meets locally identified needs.

3.5 With regards to Part 2b of this policy, we acknowledge that a Part 2 of the SHMA has been published (September 2020) which it is assumed to be the evidence that informs the requirements of part 2b. However, this is liable to change as **subsequent SHMA's are prepared and published** and therefore it is recommended for the policy to be effective and justified, this is amended to make reference to an up-to-date SHMA (or equivalent survey endorsed by Shropshire Council). A failure to do this could mean that the policy requirements become outdated through the lifetime of the Plan.

DP2. Self-Build and Custom-Build Housing

3.6 Whilst Taylor Wimpey is generally supportive of this policy and the provision of self-build and custom-build housing, as set out in our previous representations it is considered that the current

blanket style approach, for all sites within the County is inappropriate and unjustified. This currently requires all sites of over 10 dwellings to provide 10% of dwellings as serviced plots.

- 3.7 This provision does not reflect the current need within the County. **Based on the Council's Self-Build Register data**, it is noted that the number of applications for self-build plots is falling year-on-year with applications for just 62 self-build plots made between October 2018 and October 2019, down from 127 and 136 in the previous two years across the whole local authority. The evidence of the most recent reporting year (19-20) is down further with just 36 applications however it is noted that this may have been impacted by the COVID-19 pandemic and restrictions in place.
- 3.8 To put this into perspective, given that all Local Plan and SAMDev allocations (without planning permission) appear to fall into the requirement of providing 10% of plots for self-build and custom build housing, this would result in the creation of around 1,250 plots over the plan period, before any account is taken of windfall sites which are required to provide provision through Policy DP2. This amounts to an average of 57 plots being delivered per annum over the plan period. Whilst the average number of registrants per year exceeds this (at 107 per annum), the SHMA demonstrates that on average, 144 self-build properties are being granted planning permission per year in a **'policy-off' position, with the current SAMDev policy not requiring the provision of any self-build plots** within developments. Given that the SHMA estimates this carrying on through the plan period, presumably with the residential policy allocations, this would result in the delivery of on average, 201 self-build plots per annum, almost double that identified on average within the self-build register. Clearly this evidence suggests this current requirement is a significant over estimation of the demand and requirement for self-build plots.
- 3.9 This is a particular issue for larger sites/allocations such as Tasley Garden Village, with the **development expected to deliver a full years' worth of supply for the whole County on a single site**. Whilst the suggested 10% could be deemed an appropriate amount for smaller sites, to ensure that the policy does not result in a supply of self-build plots that far exceeds the demand that the evidence suggests exists, it is recommended that a cap is applied on the provision on strategic sites over a certain size. Where this cap falls would require a detailed assessment of expected supply, building upon the work prepared as part of the SHMA.
- 3.10 With regards of part 2d of the policy, the length of time of marketing of the plot has been revised, as per our comments to the Regulation 18 plan. Whilst this is welcomed, **we would still consider 'at least 24 months' to be overly restrictive and would hamper** the delivery on other plots on site. To ensure that this policy is effective in ensuring the continued delivery of housing, we would suggest that the marketing period is reduced to 12 months. This is particularly relevant on larger sites noting that these will continue to deliver new homes, and therefore new self-build plots, over the entire plan period which could easily result in new self-build plots being ready to be marketed before the sale of existing plots, or the end of their mandatory marketing period.

DP.3 Affordable Housing Provision

- 3.11 Taylor Wimpey is fully supportive of this policy and the need to deliver affordable housing. The policy is considered to be sound as we find it to be consistent with national policy, positively prepared and justified.

DP9. Managing and Supporting Town Centres

- 3.12 Whilst Taylor Wimpey is generally supportive of this policy, we would like to reiterate the comments which were made in our representations to the Regulation 18 plan.
- 3.13 To ensure that the policy is effective and consistent with national policy, the retail hierarchy should include any planned local centres at strategic sites within the borough, which would include the local centre which is proposed to be delivered at Tasley Garden Village. This would provide appropriate policy support for the uses and protection from future out-of-centre proposals which would affect the viability and deliverability of planned local centres. By including the planned centres within the retail hierarchy, it would ensure the policy is positively prepared and effective and therefore it would be considered to be sound.

DP11. Minimising Carbon Emissions

- 3.14 Taylor Wimpey supports this policy overall and the need to minimise carbon emissions however we would like to reiterate some of our previous concerns with the wording of this policy.
- 3.15 The concerns raised, within Part 1d of the policy, still remain as per the comments made within our representations to the Regulation 18 consultation. Although we recognise that there is some **flexibility within the text, which states 'strongly encouraging', Taylor Wimpey wish to highlight to the Council that it may not be possible on all sites of 50 dwellings plus to achieve zero net-carbon.** The plan runs until 2038 and therefore, there is another 12 years until 2050 when the government seeks to achieve zero-net carbon emissions. As time moves on, it is likely that technology will move on and different building materials will be uncovered which will make zero net-carbon emissions more achievable.
- 3.16 To make this policy justified and effective, we recommend that the policy wording is amended to **state 'encourage'. By making this subtle amendment to the wording it will ensure that zero net-carbon emissions are achieved where possible, but will also not render some developments unviable or not possible due to being unable to achieve zero net-gain.** Throughout the plan period, we agree there should be a marked shift to providing zero net-carbon developments but enforcing this now, when technology is still catching up, could halt development.
- 3.17 With regards to Part 2 of the draft **policy, we note the Council's amendments to this wording from the previous draft, in light of our comments.** The policy wording now requires new non-residential developments of 1,000 sq. m or a gross site area of 1ha to achieve BREEAM excellent rating or equivalent standard within an alternative assessment endorsed by Shropshire Council. Although we recognise that this wording has been amended and additional standards considered, we still

consider this to be a high bar for developments to achieve. The Local Plan Review Viability Assessment noted the increased costs associated with the delivery of a BREEAM excellent standard, with this increasing build costs by up to 5.5%. However it is unclear whether these were actually built into the assessment, which in any case highlighted concerns regarding the viability of employment developments. As such, the requirement to achieved BREEAM excellent could cause viability concerns for some forms of non-residential developments.

- 3.18 In light of this, to ensure the policy is justified and effective, we request that the policy wording is amended to require non-residential developments to be delivered to a minimum BREEAM 'very good' standard. This will allow some developments to be delivered to a BREEAM 'excellent' standard if it is viable however there is the flexibility to deliver the development to a 'very good' standard.

DP12. The Natural Environment

- 3.19 Taylor Wimpey is fully supportive of this policy which seeks to avoid harm to Shropshire's natural assets and ensure that the assets are conserved, enhanced and restored. The policy is consistent with national policy, in particular with the requirement to deliver 10% biodiversity net gain and the protection of natural assets. As such, this policy is considered to be sound.

DP14. Green Infrastructure

- 3.20 Taylor Wimpey support the aims of this policy to provide better green infrastructure within Shropshire and to enforce all new developments to make a reasonable contribution to green infrastructure wherever possible.
- 3.21 We would like to reiterate the comments with regards to Part 1a of the policy, made in our previous representations. Part 1a refers to the need to provide a Green Infrastructure Assessment in support of development proposals. As noted above, Taylor Wimpey fully support the provision of green infrastructure within new developments however we would welcome clarity and further details as to what would be required as part of a Green Infrastructure Assessment. To ensure that the policy is effective, and will ensure that applicants provide suitable Green Infrastructure Assessments as part of development proposals, we ask that further guidance is provided on the when these assessments would be required and what they would need to contain.

DP15. Open Space and Recreation

- 3.22 Taylor Wimpey note the additional text within the policy which protects existing open space. Part 2 of the policy states that land should not be built on unless it can be proved that there is an open space surplus, the loss would be replaced or the development is for alternative sports and recreation provision. Taylor Wimpey fully support Part 2 of this policy and the need to protect public open space, whilst recognising there are some circumstances where this would be considered acceptable. We consider this part of the policy to be justified and positively prepared.
- 3.23 Part 6 of this policy (previously Part 5), refers to the need for new housing developments to provide functional areas of play and recreation. As noted in our representations to the Regulation 18

consultation, although we do not disagree that areas of play are required for new housing developments, the policy should acknowledge the specific open space needs for each settlement. At present, the policy is considered to be ineffective as it does not acknowledge that each settlement has specific open space needs, nor does it require new developments to provide the specific open space requirements for each settlement.

- 3.24 As noted in our previous representations, Appendix D of the Open Space Recreation Needs Assessment sets out what the current provision of each type of open space is within each settlement and where there is a surplus/deficit. Appendix C of the Green Infrastructure Strategy Document is an updated Open Space Assessment and provides a more detailed assessment of the provision of public open space by settlement and what the provision is expected to be at the end of the plan period. The report provides recommendations for accessible open space in the different settlements.
- 3.25 To ensure that the policy is effective in addressing the open space requirements of each distinct settlement, we suggest that the wording of part 6 of the draft policy is amended to state that new developments should consider the findings within the most up to date open space assessment when determining the provision within new developments and engage with the local planning authority. By making this amendment, the policy would be positively prepared, effective and justified and therefore could be considered sound.
- 3.26 Part 7 of this policy, previously Part 6, refers to the outcomes of the Shropshire Playing Pitch and Open Space Strategy (PPOSS). This document was published in October 2020, providing guidance to understand and assess the need for playing pitches. We have no specific comments to make on the findings of the PPOSS and support the needs to provide playing pitches and open space, in line with this strategy. Part 6 is considered to be positively prepared and justified and therefore sound.

DP16. Landscaping of New Development

- 3.27 Taylor Wimpey is supportive of this policy which seeks to create and maintain attractive and well-designed environments. Taylor Wimpey endorse the provision of landscaping within new developments.
- 3.28 The policy goes on to list a number of criteria that landscape schemes should meet. The criteria provided within Part 3 of this policy is akin to paragraph 127c of the NPFF. This policy is considered to be consistent with national policy, positively prepared and therefore is considered to be sound.

DP17. Landscape and Visual Amenity

- 3.29 Taylor Wimpey fully supports this policy. This policy recognises the need to respect, safeguard and wherever possible, restore or enhance landscape character and visual amenity in Shropshire. Taylor Wimpey has no concerns regarding the soundness of this policy.

DP18. Pollution and Public Amenity

- 3.30 Taylor Wimpey is supportive of this policy which seeks to safeguard environmental quality and public amenity, minimise pollution, mitigate adverse effects and maximise opportunities for improvements where practicable. The criteria listed therein are considered to generally reflect the aims of the NPPF to prevent development from contributing to, or being put at risk from, unacceptable levels of soil, air, light or noise pollution or land instability. Taylor Wimpey has no concerns regarding the soundness of this policy.

DP19. Water Resources and Water Quality

- 3.31 This policy seeks to ensure that development does not adversely affect the quality, quantity of flow of both of ground and surface water and ensure that there is adequate water infrastructure in place to meet the **development's demand**. Taylor Wimpey has no concerns regarding the soundness of this policy.

DP23. Conserving and Enhancing the Historic Environment

- 3.32 **Taylor Wimpey fully agree with this policy and the recognition that Shropshire's heritage assets** should be protected, conserved, sympathetically enhanced and restored. The policy recognises that the likely loss, or harm to, the significance of a designated heritage asset should be determined in line with the NPPF. Taylor Wimpey has no concerns regarding the soundness of this policy.

DP25. Infrastructure Provision

- 3.33 Taylor Wimpey fully support this policy and its acknowledgment that only development should come forward where existing capacity allows or where a shortfall can be addressed through reasonable conditions. Taylor Wimpey has no concerns regarding the soundness of this policy.

DP28. Communications and Transport

- 3.34 This policy seeks to improve transport networks, improve connectivity and accessibility, reduce car dependency and manage the impacts of transport movements. Taylor Wimpey agree that this can be achieved through the delivery of a sustainable pattern of growth and development within the County which is endorsed within Chapter 9 of the NPPF. Taylor Wimpey has no concerns regarding the soundness of this policy.

DP29. Mineral Safeguarding

- 3.35 Taylor Wimpey would like to reiterative our comments which were made to the Regulation 18 draft of the Local Plan. Part 1 of the policy confirms that applications for non-mineral development within any MSA and which could have the effect of sterilising mineral resources will not be granted unless at least one of the three named criteria is relevant. Criterion c. confirms that an exemption policy will apply in accordance with the rest of the policy wording. Having reviewed the rest of the policy, none of the identified exemptions takes into account proposals on sites allocated to deliver development. This is considered to be unsound as it clearly creates a conflict between policies.

3.36 For a site to be allocated, the Council must have fully taken into consideration all aspects of the development and its suitability for development, including Mineral Safeguarding. As such, allocated sites within the development plan should be included as an exemption to this policy. For this policy to be considered sound, allocated sites should be included within the exemption list at paragraph 4.264 of the Local Plan Review.

DP31. Managing Development and Operation of Mineral Sites

3.37 Taylor Wimpey is supportive of this policy which seeks to protect the local community and the natural/historic environment from any adverse impacts arising from mineral developments. Taylor Wimpey is supportive of sustainable mineral workings however we must highlight the importance of controlling these sites to ensure that they would not be to the detriment of the closest residential receptors or the natural/historical environment.

3.38 We would also like to highlight the importance of Part 2 of this policy which ensures that the land is restored following the working of the site to an agreed state which is capable of beneficial use. In light of this, we consider this policy to be effective and positively prepared and therefore is considered to be sound.

4. SETTLEMENT POLICIES: BRIDGNORTH PLACE PLAN AREA

S3.1. Development Strategy: Bridgnorth Principal Centre

- 4.1 This part of the representations provides specific comments on the policy for the Bridgnorth Place Plan Area, S3.1 Development Strategy: Bridgnorth Principal Centre.
- 4.2 Taylor Wimpey fully support the proposed level of housing growth attributed to Bridgnorth which will help address the affordability issues within the town and will help to boost economic growth. This part of the policy is considered to be sound.
- 4.3 With regards to the level of employment land proposed, we have previously raised concerns with this in our representations to the Regulation 18 draft of the Local Plan Review and noted that there was no evidence to demonstrate how this had been calculated. Since this time, we acknowledge that the Council have commissioned an Economic Development Needs Assessment prepared by **Lichfield's** (December 2020) which sets out the employment land requirements for the borough.
- 4.4 The Economic Development Needs Assessment (EDNA) provides an indicative gross land requirement based on 5 different scenarios before concluding that the appropriate baseline employment needs should be based on the current SM labour supply scenario (Scenario 3) for the lower end, and past take up rates (Scenario 5) for the upper end. As such the identified need is between 162 hectares and 264 hectares of gross employment land between 2016 and 2038 allowing for the 30ha of unmet employment land from the Black Country Authorities. This is compared with the planned 300 hectares of employment land proposed to be delivered through the Local Plan Review. Taylor Wimpey do not object to the identification of a figure for the whole of Shropshire above the identified need noting the need for some flexibility and the economic growth opportunities that exist. However, we do have concerns regarding the proposed Green Belt release at Stanmore and the impact this could have on the deliverability of other sites within Bridgnorth. This is discussed later in this section of these representations.
- 4.5 Taylor Wimpey fully support and endorse Part 3 of the policy which confirms that a mixed use sustainable urban extension at Tasley will contribute to the residential and employment needs of Bridgnorth. Taylor Wimpey consider that the identification of Tasley as the main location to support the residential and employment development requirements for Bridgnorth to be an appropriate strategy and is supported by a robust and very detailed evidence base. As noted within paragraph 72 of the NPPF, the supply of large numbers of new homes can be best achieved through the planning for larger scale development such as new settlements or significant extensions.
- 4.6 With regards to Part 7 of this Policy, as per our comments regarding Policy DP. 9, the planned local centre should be designated as a centre, within the retail hierarchy to assist its delivery and protect it the impact of any out of centre developments. The local centre will be a central point for the new development and will serve the needs of local people. As per Chapter 7 of the NPPF and in particular paragraph 85, planning policies should define a network and hierarchy of centres and promote their

long term vitality and viability. To ensure that this part of the policy is consistent with the NPPF and therefore sound, we ask that the proposed local centre within the urban extension is included within the retail hierarchy as identified at Policy DP9.

- 4.7 Part 8 of the policy deals with the area identified as a 'Potential Direction of Growth'. Taylor Wimpey support the identification of this broad area for potential future growth and consider it necessary in order to be able to demonstrate that the Green Belt boundary, to the east of Bridgnorth, would endure well beyond the Local Plan period. We would suggest some alterations to the wording of this part of the policy to allow for some flexibility in the delivery of the Tasley Garden Village site (BRD030) to allow for infrastructure and open space to be provided within this area (where necessary) and also to take into account minor amendments which may be necessary to the boundary of BRD030 as the masterplan for the site evolves and develops through the preparation of the Supplementary Planning Document.
- 4.8 This will ensure that the proposed planning and design of Tasley Garden Village is not artificially hampered or restricted solely to the current planned boundary of BRD030 and ensure that the policy is effective in delivering a high quality development informed by the future SPD. This is important given that the current boundary of BRD030 is defined by the early masterplanning work carried out by Taylor Wimpey.
- 4.9 The following revised wording is suggested to make an allowance for this, with the suggested amended text is provided in Bold.

'8. To provide certainty about the ability to meet future development needs, an area of land beyond the Bridgnorth development boundary has been identified as a potential future direction of growth, beyond the current Local Plan period. This land remains open countryside and development will only be permitted in this area where it would provide open space or infrastructure provision to support the development of Tasley Garden Village (BRD030) or in accordance with other policies in the plan. The sites future development is dependent on its allocation within a future Local Plan. This land is set out in Schedule S3.1(iii) and identified on the Policies Map.'

Schedule S3.1 (i) Mixed Use Allocations

- 4.10 Three sites have been included as draft allocations within Bridgnorth to deliver the housing and employment needs of Bridgnorth and these are:
- Tasley Garden Village (BRD030)
 - 1,050 dwellings;
 - 16 hectares of employment land;
 - New local centre;
 - 20 hectares of green infrastructure; and

- 19 hectare linear park.
- Land north of Stanmore Industrial Estate (P58a)
 - 6.8 hectares employment land.
- Land adjacent Hickman Road, Stanmore Industrial Estate (STC002)
 - 4.6 hectares employment land.

4.11 We discuss each of the draft allocations in turn below.

Tasley Garden Village (BRD030)

4.12 Taylor Wimpey fully support the allocation of Tasley Garden Village (BRD030) for the delivery of a mixed use allocation and consider this allocation and policy to be sound with it being supported by a significant amount of evidence demonstrating the site's suitability for development. Taylor Wimpey has provided a vision document and masterplan demonstrating how the BRD030 site and wider area could be brought forward along with a suite of technical documents which further support this.

4.13 In terms of the specific guidelines provided, it is stated that a Supplementary Planning Document (SPD) will be prepared which will detail the vision, design code and masterplan for the site. Taylor Wimpey support the preparation of an SPD to help guide the development of the site.

4.14 However, the preparation of this SPD should not be done at the expense of the potential for the early delivery of initial phases on the site noting that such an SPD will undoubtedly take some time to prepare and consult upon prior to its adoption. Given the limited number of new homes delivered in Bridgnorth in recent years, principally down to the delays and lack of delivery on the residential allocations identified in the SAMDev, it will be of significant benefit in meeting the likely pent up demand for housing by delivering new residential development phases very early in the Local Plan Review period and ensuring a consistent supply of new homes across the plan period.

4.15 Given the nature of the site, its relationship to the existing town and proposed access arrangements from Ludlow Road which are likely to be fixed early in any future masterplanning exercise, early phases of residential development/plots could be brought forward towards the north-eastern corner of the site providing clearly defined and discreet development plots which are already well connected to, and easily accessible from, facilities within Bridgnorth. Such an approach would not hinder the preparation of an overarching masterplan, design code or vision as these could be restricted in terms of number of homes delivered, brought forward in tandem with the SPD and would still be subject to community engagement.

4.16 In terms of the specific wording of the policy, this states that that the SPD must be '*completed before any planning application for the development of this site*'. We would suggest greater clarity is required to make it clear the meaning of this part of the policy with the current wording making it unclear as to whether the SPD has to be adopted (i.e. what is meant by completed) prior to the

submission or determination of any planning application. We would suggest the following wording to ensure that the policy is appropriate concise and effective, whilst also allowing the delivery of some initial phases in the event that the SPD is unable to be adopted very soon after the adoption of the Local Plan Review. Additional text is highlighted in bold and deleted text struck through:

*'**The development of this site will be** delivered in accordance with a vision, design code and masterplan which will be prepared in consultation with the public and adopted as a Supplementary Planning Document by Shropshire Council. This SPD will represent a significant material planning consideration and should ~~must~~ be ~~completed~~ adopted before the determination of any planning application for development of the site. In the event an application is submitted prior to the adoption of the SPD, this will be considered against its impact on the development of a wider masterplan, vision and design code for the site.'*

- 4.17 The above suggested amendments would ensure that any initial development on the site does not hamper or prejudice the delivery of a site wide masterplan, vision and design code whilst also ensuring delivery in the very early years of the Local Plan Review.
- 4.18 The development guidelines state that at least 10% of the energy to be generated from on-site renewable and low carbon energy sources. Whilst Taylor Wimpey welcome and support the provision of renewable energy sources, as per our comments regarding Policy DP.11, the level of energy achievable should be dealt with through the future SPD to ensure that it takes into account the vision, design, and masterplan for the site. It would be more effective for this to be included within the SPD to include these details within the forthcoming SPD and in accordance with Policy DP.11.
- 4.19 The draft policy guidelines confirm that the employment development within Tasley Garden Village to be an intrinsic element of the development, which Taylor Wimpey endorse. Additional employment land is needed to address the current balance between housing and employment and attract new businesses and industries into Bridgnorth, which will assist in securing economic growth. We agree that the employment land should be located in a gateway location along the A458, which is one of the main arterial routes into Bridgnorth and, as recognised in the EDNA, is an obvious and appropriate location for growth.
- 4.20 The development guidelines suggests the employment uses should be targeted towards office and research and development on the basis that this would complement wider employment opportunities in Bridgnorth and contribute to the objectives of the Shropshire Economic Growth Strategy. Whilst Taylor Wimpey generally support this, it is important that the type of employment delivered on the site is not so constrained that it will prevent it from serving future and existing business needs, including the ability to adapt to changes in business requirements, particularly as the economy responds, recovers from, and changes following the COVID-19 pandemic. As such, the development guidelines should include some flexibility to provide other employment uses that

would be suitable for this location. This will ensure that the plan is effective in helping to deliver this new employment area.

- 4.21 Taylor Wimpey fully support the delivery of a local centre within the Garden Village to deliver localised retail and community uses. As noted in our comments to Policy DP9, it is considered appropriate to include the local centre as a designated centre within the retail hierarchy to ensure policy support for the development, and importantly, help to protect its future vitality and viability from any future out-of-centre proposals that may be brought forward. This amendment would ensure that the proposed local centre within the development is effective in supporting and protecting the centre.
- 4.22 The development guidelines go on to state that the provision of retail and community facilities will be linked to the first phase of residential development. However, it is considered that such matters are more appropriate to consider through the SPD to ensure that it can be informed by the masterplan and any plans relating to the phasing of development. This is important as the phasing and delivery of the local retail and community facilities will largely be dependent upon its siting within the wider development site. For example, if the centre is to be located centrally within the proposed allocation to ensure it is well-located for the whole development, bringing forward this in tandem with the first phase may not be possible. Taylor Wimpey suggest that for this part of the policy to be considered justified and effective, that this should be determined through the SPD.
- 4.23 The development guidelines state that extensive open space will be delivered on site, including new playing fields and associated facilities, green infrastructure and a new linear park. As shown within the masterplan and vision document, Tasley Garden Village will be able to deliver all the open space requirements noted above. The open space will be of a good quality and quantity to meet the needs of the community and will reflect the principles of a Garden Village.
- 4.24 The development guidelines also note the requirement for the existing designated heritage assets to be retained which Taylor Wimpey support. However, Taylor Wimpey consider the requirement to retain non-designated historic farm buildings to be retained is not justified and is imprecise noting that it does not provide certainty as to what is meant by historic and an assessment of each buildings significance, or merit in retaining, has not been carried out. This is particularly the case for some existing farm **building/sheds which could be considered 'historic' yet are unlikely to be of any significance or have any merit in retaining.**
- 4.25 The guidelines confirm that the use of buffers, effective design and materials will be used to mitigate any noise, dust or odour issues arising from the A458, proposed employment development and the SAMDev employment site. Taylor Wimpey fully support this approach and this would undoubtedly be considered in further detail through the preparation of the SPD and any future planning applications.
- 4.26 The development guidelines state that before occupation of the first dwelling on the site, any poultry units operating on the site or land within the wider site promotion identified on the Policies Map as

a Potential Future Direction of Growth will cease operation. However, it is considered that such a policy requirement is unnecessary and would merely replicate requirements set out elsewhere in the plan including draft Policy DP18 – a policy which would deal with any issues arising from any poultry units (and other sources of noise/odour) which any future development proposals would need to accord with.

- 4.27 Whilst we note that a planning application remains with the local planning authority for the erection of poultry units, these are located a significant distance away from much of the draft allocation and significantly further away than other existing (and planned) residential properties. For example, noting that first phases of residential development of the site is likely to be focused in the eastern area of the site, this area is over 900m to the east of the proposed poultry unit compared to the 350m to the closest existing residential properties and 450m from the existing SAMDev allocations. This highlights that such a blanket policy approach is not necessary or justified.
- 4.28 Any impacts, such as noise and odour, which may arise in the event that the poultry units are granted planning permission and constructed, would be appropriately dealt with through the noise/odour assessments which would be submitted as part of any future application for the development of Tasley Garden Village. This would ensure that future residents would not be adversely affected by any potential future operation of the poultry units.
- 4.29 The development guidelines for Tasley Garden Village require the development to be appropriately designed to accommodate pedestrians, cyclists and motorists. Creating a development which promotes sustainable modes of transport is a key priority for Taylor Wimpey and indeed, the design of Tasley Garden Village. Furthermore, Taylor Wimpey endorse they need for this scheme to complement the proposed roundabout (or any other future solution) to access the SAMDev allocation. To ensure that that this site and the adjacent sites complement each other and promote the highest quality development, we ask that the Council works with both developers to ensure that the two schemes tie together and function as a single interlinked site.
- 4.30 Overall, the development guidelines provided for the development of Tasley Garden Village are generally considered to be sound. There are some minor amendments which we have noted, which would make the policy effective and justified and we ask that the Council consider the amendments suggested.

Land north of Stanmore Industrial Estate (P58a) / Land adjacent Hickman Road (STC002)

- 4.31 As already highlighted, the draft allocations include the proposed release of Green Belt land at Stanmore Industrial Estate, 6.8 hectares of employment land is allocated at land to the north of the industrial estate and 4.6 hectares is allocated at land adjacent to Hickman Road. As previously highlighted, Taylor Wimpey has concerns regarding the need for the proposed employment allocations around Stanmore and the impact this would have on the deliverability of employment land within and adjacent to Tasley Garden Village.

- 4.32 Clearly, given the Green Belt location of these sites there is a requirement to demonstrate Exceptional Circumstances as is recognised by the Council. Having reviewed the updated Green Belt Exceptional Circumstances paper, we would like to reiterate the comments made in our previous representations to the Regulation 18 draft of the Local Plan Review.
- 4.33 The Exceptional Circumstances Statement continues to make reference to evidence regarding current demand, capacity and occupancy rates at the existing Stanmore Industrial Estate, which has not been published, nor does it form part of the evidence base for the Local Plan. Noting that the purpose of the planned Green Belt release at Stanmore is to provide future growth of the industrial estate, it is important that any such evidence on these matters is published and can be properly scrutinised for the policy to be found sound. We reserve the right to comment and review any such evidence once published.
- 4.34 Notwithstanding this, we welcome the additional wording within the development guidelines which requires the employment development to be targeted towards the engineering and advanced manufacturing sectors, to complement the employment offer on the existing Industrial Estate. This part of the policy is considered to be effective noting that the Exceptional Circumstances Statement makes reference to the aim of delivering a concentration and expansion of advanced manufacturing and engineering floorspace at the site.
- 4.35 Nevertheless, having reviewed the evidence currently available, we do not consider that the current draft allocations at Stanmore Industrial Estate have demonstrated exceptional circumstances and in light of this, there is no need or justification to release Green Belt land around Stanmore to accommodate employment uses. As such, to ensure the plan is sound we suggest that the employment allocations on Green Belt land at Stanmore are removed from this Local Plan Review and the land remains undeveloped Green Belt land.

S3.1 (iii) Potential Future Direction of Growth

- 4.36 We have commented on detail on this part of the Policy already.

Conclusions

- 4.37 In summary, Taylor Wimpey support the identification of land at Tasley Garden Village to help deliver both the economic and residential needs of the town over the plan period, and potentially beyond. This approach is supported by a wealth of evidence demonstrating the sites suitability to deliver the development envisaged. As such, and subject to some minor amendments to the policy, and the removal of the Green Belt release sites at Stanmore, the draft policy is considered to be sound.

5. BRIDGNORTH DEVELOPMENT OPTIONS ASSESSMENT (DECEMBER 2020) (EVIDENCE BASE)

5.1 This section provides our commentary on the evidence base document entitled: Summary of the Assessment of Garden Village Proposals in Bridgnorth. A similar document was prepared and published as part of the Regulation 18 consultation and Taylor Wimpey made comments on this document. This document has since been updated and therefore we provide commentary on the updated document.

5.2 As noted within the document, **within the 'Regulation 18' Preferred Sites consultation in November 2018, a proposed 'Garden Village' extension at Stanmore, within the Green Belt, was identified as the preferred allocation. However, after this consultation, a proposed 'Garden Village' was presented to the Council by Taylor Wimpey. This offered the Council an alternative option to development within the Green Belt. Both sites, along with a series of other smaller sites where subject to detailed site assessments which informed the 'Regulation 18' Pre Submission Draft of the Shropshire Local Plan.**

5.3 Further to the site assessments and reflecting on national policy and consultation responses, the **'Regulation 18' Pre-Submission Draft** proposed:

- **To allocate land at the proposed 'Garden Village' extension at Tasley for around 1,050 dwellings; 16ha of employment land; a new local centre (with an appropriate range of retail and community uses including a community centre, a primary school, and if required by the CCG a new medical centre); 20ha of Green Infrastructure and a 19ha linear park.**
- **To identify land at the proposed 'Garden Village' extension at Tasley beyond that proposed for allocation, as a future potential direction for growth beyond the current Local Plan period.**
- **To allocate two areas of land (totalling around 11.5ha) that are currently within the Green Belt for employment uses, to allow for the expansion of the successful Stanmore Industrial Estate.**
- **To retain the remaining majority of the Stanmore area previously preferred for development, as Green Belt, and not to allocate or safeguard this land for future housing or employment development.**

5.4 As noted within the document, during the consultation on the Regulation 18 draft of the Local Plan, Taylor Wimpey provided further information to the Council in support of the site. It is also noted **that the promoters of Stanmore 'Garden Village' also provided additional information. In light of this, updated detailed site assessments have been undertaken to inform the 'Regulation 19' draft of the plan, as part of the wider Sustainability Appraisal. We will provide comments on the Sustainability Appraisal within Section 8 of this report.**

5.5 The following sets out our commentary on the key considerations which have been noted within the Bridgnorth Development Options Assessment.

Green Belt

5.6 Tasley Garden Village is located within the Open Countryside. Stanmore Garden Village would be located within the Green Belt.

5.7 As noted within the assessment, the release of the Green Belt land for development at Stanmore would have harm on the Green Belt and to varying degrees;

- Moderate (a small sub-parcel of P54 to the west of the Hobbins and P58;
- Moderate High (P56 and land safeguarded for future development); and
- High (majority of P54).

5.8 Whilst we fully agree that the release of the Green Belt land around Stanmore Industrial Estate would clearly result in harm to the Green Belt, we disagree on the level of harm attributed to each parcel as **is set out within the Council's Green Belt Stage 1 Assessment and Stage 2 Review**. We have concerns with this this assessment which were noted in our representations to the Preferred Sites Consultation in February 2019. We consider the harm noted is an underestimation of the contribution that the sites around Stanmore make to Green Belt purposes. These assessments have not been updated and therefore our comments made in February 2019 remain and are still relevant. Rather than repeating our comments, we have attached an extract from these previous representations at Appendix 2.

5.9 As highlighted within the previous representations provided at Appendix 2, it is considered that the correct degree of harm that the development of these parcels would form is higher that stated within the Green Belt Assessment with the harm on Parcel P58 and P56 being underestimated. At the very least, the parcels in question should be considered to range from Moderate High and High levels of impact on the Green Belt.

5.10 Chapter 13 of the NPPF is clear on the importance of the Green Belt. As noted in paragraph 133, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 136 goes on to confirm that Green Belt boundaries should be only altered where exceptional circumstances are fully evidence and justified through the preparation or updating plans. Paragraph 137 goes on to state that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

5.11 As per the requirements of Chapter 13 of the NPPF, Shropshire Council have fully considered the option of a Garden Village at Tasley as a sustainable, deliverable and suitable alternative option to

meet Bridgnorth's needs. This option would not require Green Belt release and is therefore a reasonable alternative to meeting the identified need at Stanmore Industrial Estate.

- 5.12 We have raised our concerns within Section 4 representations regarding the need to release Green Belt land at Stanmore Industrial Estate for additional employment land and, based on the evidence available, do not consider that there are any Exceptional Circumstances which warrant this.
- 5.13 As noted with paragraph 21 of the Bridgnorth Development Options Assessment, there is a significant need for housing within Bridgnorth. The settlement has seen limited housing delivery over the past few years, despite a growing demand which has exacerbated the existing affordability issues and greater and even greater demand. Housing and employment land needs to be located in and around this settlement, as opposed to elsewhere in the County or within different local authority areas.

Highways – Vehicles

- 5.14 As noted within the assessment, Tasley Garden Village benefits from direct access onto an A Road (the A458) with the current draft masterplan and highways work demonstrating how the scheme could accommodate three dedicated vehicular access points in total with two access points proposed onto the A458 and one access point on Ludlow Road.
- 5.15 A Transport Assessment has been prepared by WYG in support of the scheme which confirms that the access points and local highway network is capable of accommodating the level of traffic associated with the proposed Garden Village. The Assessment considers the surrounding network, and highlights that all the junctions assessed on the local highway network would operate acceptably, even under peak hour loading conditions in an assessment year corresponding with the end of the Local Plan period (2038). The increase in queues, delays and RFC due to the development are generally nominal and could be further mitigated if required, by minor and deliverable improvement measures.
- 5.16 The proposed Tasley Garden Village is therefore consistent with the aims and objectives of Chapter 9 of the NPPF in there are no critical and few significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety and any impacts can be cost effectively mitigated.

Highways – Pedestrians and Cyclists

- 5.17 At the outset, the assessment suggests that both sites are a similar distance from Bridgnorth centre. Whilst this may be the case 'as the crow flies' when measuring off a map, there are significant differences between the two sites and their ease of accessibility with the centre of Bridgnorth and the main concentration of facilities and services. This is a key matter in the consideration of sites noted within the Assessment which highlights that:

'Promoting sustainable modes of travel is a key consideration. Furthermore, if a site cannot demonstrate that some trips will be via sustainable modes, this will increase the dependency on vehicles and increase the impact on the surrounding network.'

5.18 The following explores this matter further and considers the pedestrian and cycle accessibility of each site.

Tasley Garden Village

5.19 The site is located in a sustainable and highly accessible location on the south western edge of Bridgnorth and has good access to a range of services and facilities within Bridgnorth, including those already planned through the existing SAMDev site allocations. The town centre is located 1.9km from the site and can be accessed on foot within 20 minutes. Within walking distance of the site are a number of key services, including retail, services, education, healthcare, employment and leisure.

5.20 As noted in paragraph 34 of the assessment, although Tasley Garden Village is separated from the main built form of Bridgnorth by the A458, work undertaken has demonstrated that a footbridge over the A458 could be delivered to prioritise the movement of pedestrians and cyclists. Initial designs have been drawn which demonstrate that a footbridge is achievable in this location, whilst meeting all necessary highway design standards. **Furthermore, from WYG's preliminary investigations, it has come to light that not only is a footway cycle bridge feasible, but there is also some considerable design flexibility in how a bridge structure may evolve and still be contained within the public highway.**

5.21 Tasley Garden Village will create a highly sustainable community, with new jobs, education, retail and employment opportunities on site, which will reduce the need to travel. As well as this, high quality pedestrian and cycle connections would be provided throughout the development and on the surrounding highway network linking to existing network infrastructure and providing new infrastructure. This will ensure that safe and suitable access is achieved for all users.

5.22 Taylor Wimpey agree with **the Council's assessment**, in particular at paragraph 37 which notes that Tasley Garden Village provides greater opportunities to make localised improvements to the surrounding network to ensure that the development is integrated into the existing built up area of Bridgnorth.

5.23 The proposals at Tasley Garden Village fully comply with the objectives of the NPPF in that:

- This development would in a location that it is sustainable and can be made more so, through limiting the need to travel and offering a genuine choice of transport modes (paragraph 103);
- Appropriate opportunities to promote sustainable transport modes have been and will be taken up, given the type of development and its location (paragraph 108);

- Safe and suitable access to the site can be achieved for all users (paragraph 108); and
- There are no critical and few significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety and those can be cost effectively mitigated to an acceptable degree (paragraph 108).

5.24 On this basis, the allocation of this site is consistent with national policy and is therefore considered to the sound.

Stanmore Garden Village

5.25 Although the assessment notes that the sites are a similar distance from Bridgnorth Centre **'as the crow flies'**, we welcome the commentary provided by the Council which notes the difficulty pedestrians and cyclists would face travelling from the site to the town centre. Taylor Wimpey agree with this consider the Stanmore site to be inaccessible from Bridgnorth Centre, and existing education/healthcare provision for pedestrians and cyclists.

5.26 As noted within paragraph 31 of the assessment, the land at Stanmore is separated from the built form in Bridgnorth by Hermitage Ridge. Hermitage Ridge is a designated ancient woodland. The promoters of Stanmore are proposing improvements to the Public Rights of Way which run through Hermitage Ridge, which would most likely have as significant detrimental impact on this ancient woodland. Paragraph 175c of the NPPF provides protection for ancient woodlands, stating that development resulting in the loss of deterioration of irreplaceable habitats such as ancient woodland should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. We have seen no evidence that wholly exceptional reasons exist which would warrant the deterioration of this asset nor has a suitable compensation strategy been proposed. We provide further commentary on this point within the ecology heading of this section.

5.27 As noted within the assessment, not only does an ancient woodland sit between the built up area of Bridgnorth and the site, but there is also a significant change in levels. Whilst there is an existing pedestrian route available using the existing PROW network running through Parcel 56, along Hermitage Hill and then down across an open field to Hazel View/Elmhurst and the residential area below Hermitage Ridge, these are unpaved and unlit and requires pedestrians to descend from Hermitage Hill through a steep open field with a steep drop of around 34m with a gradient as high as 25% (i.e. 1 in 4). This is unlikely to be accessible during wet weather and throughout the winter. This is not considered to be suitable for the majority of pedestrians or cyclists. Even if improvements could be made through Hermitage Ridge Ancient Woodland, these would not resolve the issues of the significant gradient that must be tackled when coming down from the ridge.

5.28 In terms of the potential accessibility on foot and on cycle using the existing highway network, the two main access roads to the site from the town centre of Bridgnorth are Wolverhampton Road to the north and the A458 to the south. Wolverhampton Road provides the shortest route from the proposed Stanmore site to Bridgnorth and the town centre, on foot and by cycle, with a distance of around 2.6km from the centre of the Stanmore site. However, it should be noted that this

measurement is to the part of the town centre located in Low Town whereas the majority of services and facilities are located across the River at High Town. High Town is located a further 0.6km from the Stanmore site. High Town is also home to the only secondary school provision within Bridgnorth and is some distance from Stanmore.

- 5.29 Notwithstanding this, Wolverhampton Road does not lend itself to pedestrian use owing to the narrow footpath along it and, importantly the incline of the road from the town centre to Stanmore which sees a change in height of around 73m between the bottom of Wolverhampton Road and where it passes through Hermitage Ridge with a maximum gradient of 11% in places. It is therefore clear that Wolverhampton Road does not provide an appropriate or reasonable pedestrian or cycle access to existing services and facilities within Bridgnorth.
- 5.30 The alternative route would be the A458 (to the south of the site) although this is a greater distance, with the Low Town part of the town centre located approximately 3.9km from the Stanmore site and High Town being located a further 0.4km away. As with Wolverhampton Road, the footpath along this road are narrow and the incline, particularly on the eastern side of Hermitage Hill, is significant and does not lend itself to pedestrian or cyclist connectivity between the town and Stanmore site.
- 5.31 As such, the Stanmore site is clearly inaccessible and remote from key day-to-day services in Bridgnorth for both pedestrians and cyclists. It is clear that given local geography and the location of existing facilities, walking or cycling do not represent feasible modes of transport for all but the fittest residents wanting to access day to day services within Bridgnorth. As such, cycling and pedestrian access to the site from the main concentration of homes and facilities is extremely poor which would put a much greater reliance upon private car usage to access day-to-day facilities, including access to education facilities.

Heritage

Tasley Garden Village

- 5.32 A detailed Heritage Assessment has been prepared in support of the site by Taylor Wimpey which confirms that the proposed development would result in less than substantial harm, at the lower end of the spectrum for both the Grade II former farmhouse and the Grade II Leasowes. This should also be weighed alongside the public benefits of the development proposals, as per paragraph 196 of the NPPF.
- 5.33 **Paragraph 63 of the assessment notes that following consultation on the 'Regulation 18' Pre-Submission Draft of the Local Plan Review, Historic England have no objection to the proposed allocation site at Tasley (BRD030). Historic England notes that there is potential to affect the Grade II Listed Buildings and associated historic landscape character, however this has been clearly addressed within the Development Guidelines within the Local Plan which Taylor Wimpey would fully support and agree with. The masterplan has been designed with the Listed Buildings in mind**

and development has been set back from these assets and this is likely to be further considered through the preparation of the SPD.

- 5.34 **We fully endorse and support the Council's conclusion that Tasley Garden Village represents the less risk to heritage assets than Stanmore Garden Village.**

Stanmore Garden Village

- 5.35 We now go on to provide commentary on the heritage concerns associated with the development of Stanmore Garden Village. We provided detailed comments on the importance of this heritage asset within our previous representations to the Regulation 18 consultation. We have appended these specific comments at Appendix 3 for reference.

- 5.36 In addition to these comments, Paragraph 54 of the assessment provides comments from Historic England, who were also consulted as part of the site assessment for Stanmore Garden Village. Historic England have advised that, contrary to the **promotor's own assessment, the development** as proposed in the current Concept Masterplan would cause substantial harm to the significance of the Scheduled Monument as a consequence of the impacts on its setting.

- 5.37 As per our previous comments provided at Appendix 3, we agree with Historic England and their recognition of the harm that the development of this site would have on this Scheduled Ancient Monument. **Historic England are the Government's statutory advisor for the historic environments** and therefore significant weight should be afforded to their advice. The NPPF is also clear that Scheduled Ancient Monuments should be considered as designated heritage assets of the highest significance. Substantial harm to these assets should only be permitted where the circumstances are wholly exceptional, which we do not consider to be the case in this instance.

- 5.38 The development of land at Stanmore would cause substantial harm to designated heritage assets and therefore the allocation of this site for development is not consistent with the aims and objectives of the NPPF.

Ecology

Tasley Garden Village

- 5.39 The proposals should be considered in the context of the NPPF and in particular, paragraphs 170171 and 174-175. Tasley Garden Village is considered to be consistent with the aims and objectives of the NPPF.

- 5.40 The proposals are supported by a Preliminary Ecological Assessment which confirms that the site does not contain any statutory natural environmental designations, which we would agree with. As noted within our previous representations and confirmed within the assessment, the site is located **within the Impact Risk Zone of two SSSI's**. Paragraph 81 of the report confirms that any risk to the **SSSI's can be managed through design, layout and construction of the development**.

- 5.41 Taylor Wimpey agree with the conclusions within the assessment confirming that the proposed Garden Village at Tasley represents less risk to ecological assets than the Garden Village at Stanmore.

Stanmore Garden Village

- 5.42 As already noted and highlighted within the assessment, the site lies immediately adjacent to an ancient woodland which runs along Hermitage Ridge. The promotor of this site has noted that a 15m buffer zone would be created between the development and the ancient woodland. We have significant concerns with this which we set out below.

- 5.43 As noted at paragraph 69 of the assessment, government guidance suggests that a buffer zone of at least 15 metres should be included between development and an ancient woodland¹. Having said **that, within the Practical Guidance Note 'Planning for Ancient Woodland – Planners' Manual for Ancient Woodland and Veteran Trees (July 2019) prepared by the Woodland Trust, a buffer of a minimum of 50m is said to be the distance which should be maintained between a development and the ancient woodland. The Council also have raised similar concerns with the smaller buffer zone proposed. A buffer zone of a minimum of 50m has not been considered/included by the site promoters which leads us to believe that suitable buffer zone of 50m is not deliverable on this site whilst also delivering the level of development proposed.**

- 5.44 Not only do we consider there to have been a lack of consideration regarding the buffer zone, but we also **question how a 'development free' buffer zone can be implemented when the promotor is suggested to create a pedestrian link through the ancient woodland down Hermitage Hill. As noted within the Ecological Technical Note prepared in support of this site;**

'As part of the development proposals, a footpath is to be created through the woodland, linking the proposed development to the existing development to the west'.

- 5.45 Given that a footpath is required through the ancient woodland to provide this pedestrian/cyclist link, we do not see how a development free buffer can be created between the site and the ancient woodland can be created. The pedestrian link would need to go through the ancient woodland to connect the site to the existing built up area and therefore a buffer of 15m or 50m cannot be implemented. In light of this, it appears inevitable that such a development would result in the loss of deterioration of the ancient woodland.

- 5.46 **The pedestrian/cyclist link is proposed to be delivered in the form of a 'boardwalk connection'.** The construction of this boardwalk footpath through the ancient woodland would undoubtedly cause a deterioration of the species and habitats within this valued ancient woodland. We would echo the concerns which have been raised by the Council in paragraph 75 of this assessment and do not

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#:~:text=For%20ancient%20woodlands%2C%20you%20should,metres%20to%20avoid%20root%20amage.&text=The%20buffer%20zone%20should%20be,15%20times%20the%20tree's%20diameter>.

consider there to be any exceptional reasons which exist to warrant the development of a boardwalk within the ancient woodland.

- 5.47 Finally, there appears to be limited assessment of the proposed delivery of a significant amount of new homes so close to the ancient woodland. As highlighted within the Wood Trust manual, the delivery of new housing close to ancient woodlands can result in harm as a result of increased use for recreation, invasion by non-native plant species (introduced into private gardens) and impacts from an increase in domesticated pets (e.g. cats).

Landscape and Sensitivity

- 5.48 The proposals should be considered in the context of the NPPF and in particular, paragraphs 127 and 170. Tasley Garden Village is considered to be consistent with the aims and objectives of the NPPF in terms of landscape and sensitivity.
- 5.49 Shropshire Council have commissioned ESP to prepare review of Tasley Garden Village and Stanmore Garden Village in terms of the Landscape and Visual Issues. We provide more comments on this review within Section 7 of this report.
- 5.50 We would confirm our general support for the conclusion provided at paragraph 93 of this assessment which states that the two proposals are broadly neutral in relation to landscape and visual impact when assessed against the current baseline. The Council however note that the proposed employment development at Tasley is considered to be more sensitive than the proposed employment development at Stanmore however this does not take into account several important issues.
- 5.51 Firstly, the proposed development at Tasley will be located adjacent to the SAMDev employment allocation which will alter the current landscape in this area. Although the SAMDev plan was adopted a number of years ago, this site is yet to come forward. It is likely that the SAMDev employment allocation will come forward before Tasley Garden Village and therefore the current situation and baseline will change significantly.
- 5.52 Secondly, although a development of this scale will be visible from several locations within the surrounding area (and more so the employment development), a detailed illustrative masterplan has been developed in line with a detailed analysis of landscape and visual issues to ensure that the development is integrated sensitively within the existing landscape and visual context. The landscape masterplan shows that development can come forward on this site whilst respecting and enhancing the surrounding landscape. A series of mitigation measures have been proposed to reduce any potential effects of the development on the character of the immediate surroundings.
- 5.53 As confirmed with the ESP review, due to the offset between 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 Tasley Garden Village may be reduced. We would agree and support this view. We also welcome and agree 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. Please refer to Section 7 and Appendix 4 for further comments on the Review prepared by ESP.

Flood Risk

- 5.54 **Although we don't disagree with the comments provided within the assessment, we would like to** reiterate the comments previously made to the Regulation 18 consultation. The areas of flood risk within the site are associated with Tiddle Brook which runs along the western/southern boundary of the site. Whilst the EA Flood Risk Map shows relatively larger areas being within Flood Zone 2 or 3 along the western boundary of the Garden Village, based on site visits these flood zones do not appear to be accurately represented, potentially as a result of the bend in the watercourse. In addition, the landowner confirmed that he was unaware of any occasions where Tiddle Brook had exceeded its banks.
- 5.55 As such, it is expected that the EA Flood Zones and the flood risk may be overestimated and that Tiddle Brook is not thought to pose a significant flood risk to development with the site being elevated above the watercourse with steep banks. Nevertheless, the masterplan demonstrates how the site could be developed to avoid this areas of potential flood risk through the creation of a new Country Park along the Tiddle Brook boundary. A comprehensive SUDS scheme will be designed to ensure the water on site is appropriately managed.

Public Protection

- 5.56 The proposals should be considered in the context of paragraphs 170 and 180 of the NPPF with regards to Public Protection.
- 5.57 Paragraph 108 of the assessment notes that a planning application is currently being determined for poultry units on the site. As noted in earlier within these representations, the earliest phases of the development of Tasley Garden Village are located a significant distance away from the application site and would be further away than existing and planned (SAMDev) residential properties. As such, and in the event that planning permission is granted and the poultry units becoming operational, the impact of these would be considered and dealt with through the consideration against draft Policy DP18 and submission of technical assessments relating to noise, odour or air quality as part of any future planning application for Tasley Garden Village.
- 5.58 This assessment, similar to the previous revision, identifies and considers a number of matters in relation to Tasley Garden Village demonstrating how these could be easily managed and mitigated through the design and layout of any scheme. Indeed, the masterplan demonstrates how the scheme would appropriately respond without affecting its ability to deliver the requirements set out in draft Policy S3.
- 5.59 In addition to the commentary provided in the assessment on the planned relocation of the livestock market, it is important to note that this allocation includes a significant area of planned landscaping

(equating to around a third of the site area) whilst also already being located in close proximity to other residential areas north of the A458 (approximately 70m from the site boundary). As such, the opportunity for offsetting and creation of landscape buffers also exists within the SAMDev site allocation itself.

Other Strategic Considerations

- 5.60 As noted within the assessment, Taylor Wimpey proposes to comply with the required/proposed affordable housing requirement set out within Policy DP3 of the Local Plan Review within Tasley Garden Village. Taylor Wimpey fully support the provision of affordable housing and deliver the required need suggested by the Council.
- 5.61 The promoters of Stanmore Garden Village appear to be suggesting that the site could deliver 30% affordable housing across the site, as opposed to the required 20%. However, it is clear from the **text in the assessment, the references to 'key worker' and 'local employment' do not appear to** actually accord with the definition of affordable housing set out in the NPPF and therefore it is unclear exactly what is being proposed in respect of the Stanmore site. In any case, we are unaware of any viability assessment having been submitted which demonstrates that 30% affordable housing delivery (in accordance with the NPPF definition) is actually viable noting the infrastructure requirements of the site and other potential s106 contributions.
- 5.62 Paragraph 117 notes that Tasley Garden Village would need to comply with the policies on energy efficiency. Taylor Wimpey can confirm that Tasley Garden Village would be a policy compliant development and deliver all the necessary requirements on site.
- 5.63 **We would like to note our support for the Council's comments at paragraph 120 of the assessment** which notes the opportunity which the development of Tasley Garden Village offers to Bridgnorth. The development of Tasley Garden Village would build on the existing employment SAMDev allocation and provide an established employment area. This concentration of employment floorspace is well related to the strategic road network and resident population for both custom and easy access for employees. This employment area would also offer different employment opportunities than those provided at the existing Stanmore Industrial estate which is based around engineering and advanced manufacturing. The two distinct areas could in fact complement each other.

Planning Balance

- 5.64 **We endorse the Council's conclusion that** Tasley Garden Village to be the most appropriate location for deliver a mixed-use allocation to meet the needs of Bridgnorth and its wider hinterland.
- 5.65 There are a number of significant concerns which have been raised regarding the proposal at Stanmore, issues which we consider to be insurmountable (pedestrian and cyclist connectivity, ecology, heritage). This is even before consideration is given to the harm such a proposed development would have on the Green Belt purposes.

- 5.66 Tasley Garden Village is not subject to any technical or environmental constraints which would prevent the delivery of the mixed-use development. The site will protect the Green Belt from development. The site is well related to existing services and facilities within Bridgnorth however the site will significantly improve connectivity to the existing built up area of Bridgnorth and provide additional services and facilities to meet the needs of existing and future residents.
- 5.67 Furthermore, we support the identification that considering the size of the site, a proportion of the site will be delivered within the plan period and the remainder of the site (the potential future growth area) can be brought forward post plan period to address the future development needs of the settlement.

Conclusion

- 5.68 **Taylor Wimpey wholly support and agree with the Council's allocation of the land at Tasley to deliver a mixed-used Garden Village for development within the plan period and the identification of land at Tasley to meet the potential future growth needs of the settlement.**

6. GREEN BELT RELEASE EXCEPTIONAL CIRCUMSTANCES STATEMENT (DECEMBER 2020)

- 6.1 A Green Belt Release Exceptional Circumstances Statement was published in August 2020 and Taylor Wimpey provided comments on this document within our representations to the Regulation 18 draft of the Local Plan.
- 6.2 As noted within Section 4 of these representations, the Exceptional Circumstances Statement has not been updated in respect of Bridgnorth. We do have some concerns with this Statement in respect of the land around Stanmore. These concerns are set out in Section 4 of these representations.

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7. LANDSCAPE AND VISUAL ISSUES - A REVIEW FOR SHROPSHIRE COUNCIL (PREPARED BY ESP LTD) – NOVEMBER 2020
- 7.1 This report was prepared by ESP Ltd, on behalf of Shropshire Council, to consider the potential landscape and visual effects arising from the proposed Tasley garden Village and Stanmore Garden Village. ESP Ltd have reviewed the Landscape and Visual Appraisal (LVA) prepared by Pegasus Group in support of Tasley Garden Village and the LVA produced by EDP Ltd in support of Stanmore Garden Village.
- 7.2 Pegasus Group have reviewed the Report prepared on behalf of Shropshire Council and overall, it is considered to be a helpful document. Our full comments on the document can be found at Appendix 4.
- 7.3 **In summary, we welcome the Review’s findings which suggest that due to the offset between Tasley Garden Village site and the Oldbury Conservation area or its surrounding land, the sensitivity of Bridgnorth A (02BGD-A) character area in the vicinity of the Tasley Garden Village site may be reduced.** We welcome the findings within the Review which states 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.
- 7.4 Furthermore, with regards to the Stanmore site, **we agree with the findings of ESP’s report** which states the assessment of 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.

8. SUSTAINABILITY APPRAISAL (DECEMBER 2020)

- 8.1 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. An initial report was published in July 2020 as part of the Regulation 18 consultation.
- 8.2 This document has been updated and re-published as part of the Regulation 19 consultation. The methodology has not been amended as part of this revised draft and therefore we do not repeat our comments on the methodology within these representations. We would request that the comments on the methodology, provided in our previous representations, are read alongside these representations. For ease of reference a copy of this part of our previous representations is provided at Appendix 5.

Stage 2a – Sustainability of Sites

- 8.3 As per the previous draft of the SA, the site assessments for Bridgnorth are set out in Appendix D of the document. We have a number of concerns with the scoring given for Tasley Garden Village (BRD030). We noted these concerns within our representations to the Regulation 18 draft of the Local Plan. Within this section, we note where our previous concerns have been addressed and where our concerns remain.
- 8.4 With regards to Criterion 3, this relates to tree preservation orders (TPO). As noted within our previous representations, the assessment suggests that a TPO is present within the site however we are not aware of any such TPO and this has not been raised as a specific constraint within the Stage 3 assessment. We still consider there to be an error here. If there is a TPO present on site, we would welcome further information and details on this TPO.
- 8.5 **With regards to Criterion 5, we welcome the Council's amendment to the primary school score.** There is a primary school located within 480m of the site and the assessment/scoring has been updated accordingly to reflect this.
- 8.6 **Our concerns remain with regards to the proximity to a children's playground**, which is only relevant **for the housing score. There is a children's playground located to the north of the site**, within the Wenlock Rise residential development. This is located approximately 385m from the site boundary and therefore this should be attributed a positive score.
- 8.7 With regards to the overall scoring, we welcome the amendments which have been made for both the employment and housing scores. As per our previous comments, we noted that the employment site should have scored -6 (fair) and that the revised report agrees with this.
- 8.8 In terms of the housing score, we acknowledge the amendment of the score to reflect the proximity to the primary school, however the site should score -6 (fair), when taking into account the **proximity to the children's play area** already identified.

Stage 2b – Screening of Sites

- 8.9 We have no comments to make on Stage 2b of the site assessment process.

Stage 3 – Detailed Site Review

- 8.10 As per our previous comments to the Regulation 18 draft, Taylor Wimpey fully support the findings of Stage 3 of the assessment with regards to BRD030. 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 wish to raise our concerns with the highways accessibility score.
- 8.11 The assessment refers to a highways accessibility rating however BRD030 has not been scored in this regard, whereas other sites have. The report does not provide any clarification as to why some sites have been scored and others have not. Similarly, there **are no details of what is a 'good' highways accessibility score and what score is considered 'poor'**. We would welcome further clarification on this point.

9. CONCLUSION

- 9.1 These representations have been prepared by Pegasus Group on behalf of Taylor Wimpey in respect of the Pre-Submission draft of the Local Plan Review. These representations have been submitted **in respect of our client's land interests at Tasley Garden Village (BRD030)**.
- 9.2 Tasley Garden Village is an available, suitable and deliverable site and therefore the inclusion in the draft Local Plan Review is fully supported. Taylor Wimpey also welcome the policy requirement of preparing a Supplementary Planning Document (SPD) to help guide development on the site and are committed to working with Shropshire Council, town and parish councils and local residents and businesses in order to prepare this.
- 9.3 Nevertheless, such an SPD will undoubtedly take some time to prepare and consult upon prior to its adoption. A restriction on any application on the site coming forward ahead of the adoption could delay the delivery of early phases of the residential and employment uses for a notable period. As such, it is recommended that the development guidelines are amended to allow the early delivery of some initial phases of development to ensure the development is able to start delivering early in the plan period. Whilst this may necessitate the submission and determination of a future planning application during the preparation of the SPD, this could still be done whilst achieving the vision for the site and avoid hindering the delivery of the wider site through the delivery of certain development plots.
- 9.4 The representations have provided comments on the majority of the strategic policies and a number of detailed development management policies, commenting on the soundness of these policies. Where we considered the policy to be sound, we have noted this. Where the policy is not considered to be sound, we have suggested amendments to ensure the policy is effective, justified, positively prepared and consistent with national policy.
- 9.5 We ask that the Council keep us informed of the progress with the Local Plan Review and should the Council have any concerns or queries with the information which has been submitted, please do not hesitate to get in contact.

APPENDIX 1 -VISION DOCUMENT