

Summary of the Assessment of Garden Village Proposals in Bridgnorth to inform the Draft Shropshire Local Plan

1. Bridgnorth is located at the junction of the A458 and the A442 in the east of Shropshire and is within relatively easy commuting distance of Telford, Shrewsbury, Kidderminster, Wolverhampton and the Black Country.
2. The town straddles the River Severn and comprises Low Town to the east and High Town to the west, perched on cliffs 100ft above. The settlement is bounded by the West Midlands Green Belt to its east.
3. As the third largest town in Shropshire with a considerable array of services and facilities, Bridgnorth has been identified as a Principal Centre within the ongoing Local Plan Review and will contribute towards the strategic growth objectives in the east of the County by making provision for the needs of the town and its surrounding hinterland.
4. Within the 'Regulation 18' Preferred Sites Consultation in November 2018, a proposed 'Garden Village' extension at Stanmore, to the east of the town within the West Midlands Green Belt, was identified as the preferred allocation for meeting much of the housing and employment needs of the town during the Local Plan period. This proposal was informed by a detailed site assessment process of the identified site promotions.
5. However, after this consultation a further significant site promotion for a proposed 'Garden Village' extension at Tasley to the south-west of the town was received in March 2020. Whilst this was at a relatively advanced stage of plan making, it was nevertheless incumbent upon Shropshire Council to give full consideration to this option, not least as it potentially offered an alternative to developing in the West Midlands Green Belt.
6. Therefore, these two sites, alongside a series of other smaller site promotions, were the subject of an updated detailed site assessment process, which formed part of the wider Sustainability Appraisal of the Local Plan, to inform proposed allocations for inclusion within the 'Regulation 18' Pre-Submission Draft of the Shropshire Local Plan for consultation in August 2020.
7. Further to the site assessment considerations, and having reflected on national planning policy and consultation responses made to earlier stages of consultation, the 'Regulation 18' Pre-Submission Draft of the Shropshire Local Plan, proposed the following:
 - 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.
8. Consultation on the 'Regulation 18' Pre-Submission Draft of the Shropshire Local Plan allowed the public and other stakeholders to comment on the Tasley Garden Village proposal as the preferred option before the Council moved to the more formal 'Regulation 19' stage of plan preparation.
 9. During the consultation on the 'Regulation 18' Pre-Submission Draft of the Shropshire Local Plan, further information was received in relation to both the proposed 'Garden Village' extension at Stanmore and the proposed 'Garden Village' extension at Tasley. This included a revision to the extent of the proposed 'Garden Village' extension at Stanmore and a subsequent response by the promoters of the proposed 'Garden Village' at Stanmore to representations made by the promoters of the proposed 'Garden Village' at Tasley. As such a further updated detailed site assessment process was undertaken to inform the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan for consultation, as part of the wider Sustainability Appraisal of the Local Plan.
 10. Based on the conclusions of this updated site assessment process, which was informed by consideration of national planning policy and consultation responses made in response to the Regulation 18 consultations undertaken to inform the ongoing Local Plan Review, the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan, proposed the following:
 - 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.
 11. Consultation on the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan allowed all parties to make representations on its soundness, legal compliance, and compliance with the duty to cooperate. Representations received to this consultation and any other relevant additional information provided to Shropshire Council has now been considered. With regard to Bridgnorth it was considered appropriate to review the site assessment process to ensure robustness of conclusions reached.
 12. In summary, the site assessment process undertaken is transparent and evidence-based and considers all relevant legislation, policy and guidance, and consultation responses where they raised material issues. It also includes consideration of the following factors: Green Belt; Highways; Heritage; Ecology; Landscape and Visual Sensitivity; Agricultural Land Quality; Flood Risk; Water Quality; Public Protection and any other Strategic Considerations.
 13. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the

Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.

14. With regard to the two significant proposed 'Garden Village' site promotions received in Bridgnorth, these assessments have been informed by extensive supporting information provided on both sites by the site promoters and other parties and importantly discussions with specialist officers within the Council, including Highways, Ecology, Heritage, landscape and Public Protection, as well as any relevant responses from external bodies.
15. Key considerations resulting from this site assessment are set out below. To provide context to these considerations, extracts from the National Planning Policy Framework (The Framework) are provided, however this is not intended to be exhaustive or suggest that other relevant legislation, policy and guidance has not been considered.
16. The Framework places a responsibility on the Local Planning Authority to devise an appropriate strategy for the area, taking into account the reasonable alternatives, and based on proportionate evidence. It is considered that either Garden Village option could provide for the scale of growth proposed for the town over the long term to 2038. Within this context it is considered appropriate to provide a detailed overview of the competing planning considerations between the two options, and to show the weight that has been afforded to these competing considerations. In this way this assessment can be viewed as providing the planning balance between the two competing proposed 'Garden Village' proposals and a transparent and reasoned explanation as to why one has been preferred over the other.

Green Belt

17. Land to the east of Bridgnorth is located within the West Midlands Green Belt. The purposes of Green Belt, as defined within The Framework are:
*"a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"*.
18. The land at the proposed 'Garden Village' at Stanmore is located within the West Midlands Green Belt. The Green Belt Review undertaken for Shropshire indicates that this site is located within four Green Belt parcels¹, the release of which would have the following levels of harm to the Green Belt:
 - Moderate (a small sub-parcel of P54 to the west of The Hobbins, proposed for mixed-use/residential development on the most recent Concept Masterplan prepared by the site promoter; P57, part of which is proposed for employment development as an extension of Stanmore Industrial Estate on the most recent Concept Masterplan prepared by the site promoter; and P58 part of which is proposed for employment development as an extension of Stanmore Industrial Estate on the most recent Concept Masterplan prepared by the site promoter);

¹ Green Belt parcels identified and assessed within the Green Belt Assessment and Review.

- Moderate high (P56, the parcel closest to Bridgnorth and proposed for the majority of the residential development and land safeguarded for future development on the most recent Concept Masterplan prepared by the site promoter); and
- High (majority of P54, part of which is proposed for employment development on the most recent Concept Masterplan prepared by the site promoter).

19. It is noted that within their submissions the site promoter has undertaken an assessment of Green Belt which argues that lower levels of harm to the Green Belt result from the release of some of these parcels. Whilst this information has been given consideration, the site remains within the Green Belt, and for the basis of the Council's assessment it has been decided to continue to use the Council's own independent assessment of harm. With respect to the Green Belt The Framework includes:

"136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

137. 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. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land".

20. The land at the proposed 'Garden Village' at Tasley is not located within the Green Belt, and therefore none of the above considerations apply to this site.
21. Given the emphasis placed upon the protection of the Green Belt within The Framework, it is considered this issue should be given significant consideration in the overall consideration of alternative options.
22. It is important to note that the Green Belt designation on the proposed 'Garden Village' at Stanmore has a direct and important impact on the Council's consideration of this site, in that the Council must advance an 'exceptional circumstances' argument in order to allocate this land for development. Whilst there is no precise definition of what constitutes an 'exceptional circumstance', Paragraph 137 of The Framework makes clear that a Local Planning Authority must examine fully all other reasonable options for meeting its identified need for development. This includes looking to non-Green Belt locations in adjoining authorities as part of the duty to cooperate, as well as to other non-Green Belt locations within Shropshire and associated with Bridgnorth.
23. On this issue, it should be noted that the Council have sought views of adjoining Local Planning Authorities and based on their responses it is considered unreasonable to assume this planned growth can be accommodated within these areas. Indeed, it is equally considered that given the need to plan effectively for additional residential development in Bridgnorth, especially in light of the significant under-delivery in the town over the last few years, and given the role of Bridgnorth within the proposed settlement hierarchy, it is appropriate only to seek to examine alternative options within the Bridgnorth area as part of these considerations.

Highways – Initial Context

24. By way of context, The Framework includes:

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

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

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

104. *Planning policies should:*

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

Highways - Vehicles

- 25. The land at the proposed ‘Garden Village’ at Stanmore benefits from direct access onto an A road. Specifically, proposals submitted by the site promoter, informed by evidence including a High Level Transport Appraisal, include multiple points of “*access to the site from the A454*”.
- 26. Similarly, the ‘Garden Village’ at Tasley benefits from direct access onto an A road (with an additional access proposed off Ludlow Road). Specifically, proposals submitted by the site promoter, informed by evidence including a Transport Issues Report and Supporting Transport Document, include “*the site (including the land for further development) would have three vehicular accesses, two onto the A458 (accessing the employment and residential development respectively) and a further residential access on Ludlow Road*”.
- 27. The two points of access from the A458 are understood to be through land proposed by the site promoter as employment development and for potential development beyond the emerging Local Plan period respectively. However, it is also understood from proposals submitted by the site promoter that a single access from the A458, through the land they propose for employment development has been “*sensitivity tested*” and “*would also provide access to the A458 for the wider development in the absence / advance of ‘Junction 2’*”, which is the access off the A458 through the land the site promoter has proposed for development beyond the current Local Plan period.
- 28. Shropshire Council has undertaken an initial strategic highways review of these two potential ‘Garden Village’ sites, provided as an appendix to this document. This assessment reviews the highway assessments submitted by both of the sites promoters, including assumptions on residential and employment trip

generation/trip distribution and highway capacity. It identifies limitations in the assessments undertaken for both sites and concludes that for both sites “Any modelling assessment would need to re-visited following the confirmation of trip rates, distribution proportions and internalisation of trips.”

29. However, it also concludes that “the development of either site at Tasley or Stanmore would result in impacts at junctions in future years. Further work would be required to identify appropriate mitigation to minimise residual cumulative impact in the future assessment year, although from the initial review of survey data and modelling it is considered that the level of mitigation needed would be of a level that either scheme could implement given the scale and quantum of development proposed.”
30. Ultimately, it is considered that due to the scale of both developments, it is likely that both would have a significant impact on the surrounding highway network and mitigation measures would be required to manage this growth. The conclusions of both proposals’ Transport Assessments and the initial strategic review of these two potential ‘Garden Village’ sites undertaken by Shropshire Council support this conclusion. However, it is also considered that based on these assessments and other available information, either proposal is likely to have the ability to mitigate these impacts.
31. Both sites would need to provide appropriate access arrangements, introduce traffic calming measures within the vicinity of the site and make all necessary improvements to the wider highway infrastructure. However, given the information provided within the various supporting transport assessments (including the initial strategic review of these two potential ‘Garden Village’ sites undertaken by Shropshire Council) and the scale of the development proposed, it is considered that these improvements are viable and achievable for both sites. It is therefore considered that this matter is broadly neutral so far as considering the competing merits of the two proposals. Specific interventions for either site, if allocated, would be informed by further highways assessment at the Planning Application stage and highway assessment work undertaken by Shropshire Council. Paragraph’s 108 and 109 of The Framework state:

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

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

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

Highways - Pedestrians and Cyclists

32. Paragraph 110 of The Framework states:

“110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to*

high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations”.

33. Both sites are a similar distance from Bridgnorth centre.

34. Direct access onto an A road is a benefit for vehicles but can be a disadvantage when considering pedestrian and cycle access to the site. 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.

35. The land at the proposed ‘Garden Village’ at Stanmore is separated from the built form of Bridgnorth by Hermitage Ridge. Necessary improvements to pedestrian and cycle facilities to create safe links between the site and the built form of Bridgnorth are considered essential in order to reduce the potential segregation between the existing settlement and the site, promote sustainable modes of transport and minimise any impact on air quality within the town.

36. Proposals submitted by the site promoter of the Stanmore proposal, informed by evidence including a High Level Transport Appraisal and a note on pedestrian footpath connections, include adopting a design which promotes sustainable modes of travel and reduction in the dependence on private vehicles; upgrading pedestrian and cycle links across Hermitage Ridge (following the line of existing Public Right of Way (PRoW) and Pylons); and consider it should be possible to improve and widen existing footways to Wolverhampton and Stourbridge Roads (north and south of the site), with all necessary land in the promoter’s ownership.

37. The initial strategic highways review of these two potential ‘Garden Village’ sites notes that *“The PRoW route that centrally connects the Stanmore site through to Bridgnorth has a large gradient change for pedestrians to negotiate through unlit woodland and would not be a secure route as such, the route should only be considered for leisure purposes. The significant gradient constraints along the route would therefore make it difficult to improve to make it safe and secure for all users.”* The same considerations would apply with regard to the suitability of the proposed route under existing Pylons.

38. The initial strategic highways review of these two potential ‘Garden Village’ sites includes an assessment of walking and cycling distances to local amenities. It concludes that *“the central and eastern area of Bridgnorth are walkable from the Stanmore site within 25 minutes and is cyclable within 10 minutes. The only primary school within a 2km walk from the Stanmore site is St Mary’s Bluecoat CofE Primary School. A number of retail facilities are also accessible from Stanmore. However, the secondary school and sixth form and a number of the facilities and amenities to the west of Bridgnorth are further than 2km and over 30min walk from the Site.”*

39. Ultimately, it is considered that the ability to provide effective pedestrian and cyclist links between the proposed 'Garden Village' at Stanmore and Bridgnorth requires very careful consideration given the gradient and nature of roads and footpaths between Bridgnorth and the site and the presence of ancient woodland on Hermitage Ridge (considered further within the ecology section of this report).
40. The land at the proposed 'Garden Village' at Tasley is separated from the built form of Bridgnorth by the A458. Necessary improvements to pedestrian and cycle facilities to create safe links between the site and the built form of Bridgnorth are considered essential in order to reduce the potential segregation between the existing settlement and the proposed development, promote sustainable modes of transport and minimise any impact on air quality within the town.
41. Proposals submitted by the site promoter of the Tasley proposal, informed by evidence including a Transport Issues Report and Supporting Transport Document, include adopting a design which prioritises the movement of pedestrians and cyclists ahead of vehicles and appropriate pedestrian and cycle links over the A458, including a footbridge. A Transport Note on Feasibility of a Footbridge over the A458 has also been provided illustrating initial examples of how such a footbridge could be configured.
42. The initial strategic highways review of these two potential 'Garden Village' sites notes that *"the majority of Bridgnorth is walkable from the Tasley site within 25 minutes (2km of the site) and is cyclable within 10 minutes. Various amenities are located within 2km of the site, including a number of primary schools, secondary school, the town centre and medical facilities."*
43. Ultimately, it is considered that the ability to provide effective pedestrian and cyclist links between the proposed 'Garden Village' at Tasley and Bridgnorth requires careful consideration to ensure that the infrastructure provided is safe and attractive to pedestrians and cyclists. As concluded within the initial strategic highways review of these two potential 'Garden Village' sites *"Both sites would need to upgrade and enhance the pedestrian and cycle connectivity between the Town Centre. Provision of illuminated footways, crossing points and traffic calming measures would all need to be considered."*
44. Having reflected on this matter, it is considered that in relation to pedestrian and cyclists, the proposed 'Garden Village' at Tasley provides greater opportunities to make localised improvements to the surrounding network to ensure the new development is not segregated from the existing settlement of Bridgnorth, in particular there appears to be more opportunities for effective improvements to pedestrian and cycle facilities than the proposed 'Garden Village' at Stanmore, given the location and relationship of each site with the existing built form of the settlement.
45. It should be noted that it is considered both sites offer the potential for enhanced public transport links into the town. This is reflected within the proposals received from both site promoters which include extending/diverting existing or providing new public transport routes through each site and provision of park and ride/choose facilities. It is also supported by the initial strategic highways review of these two potential 'Garden Village' sites, which concludes that *"Both sites also show potential for existing bus routes to be diverted into the site."* As such this matter is broadly neutral so far as considering the merits of the two proposals.

46. It should also be noted that consistent with Paragraphs 103 and 104 of The Framework, both site promotions are of a scale that a level of self-containment would be expected, through provision of a mixed-use development including a local centre, primary school, housing and employment; and that pedestrian and cycle links can be provided within the site itself. Again, this is reflected within the proposals received from both site promoters. As such this matter is broadly neutral so far as considering the merits of the two proposals.
47. However, whilst self-containment can reduce the number of trips from the site into Bridgnorth, ultimately the reason for the development is to meet the needs of Bridgnorth and a site adjacent to its built form will benefit strongly from the ability to sustainably access the services and facilities available within the town.

Heritage

48. The Framework includes:

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

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

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

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

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

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

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

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

- c) *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) *the harm or loss is outweighed by the benefit of bringing the site back into use.*

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

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

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

- 49. The land at the proposed ‘Garden Village’ at Stanmore includes part of the designated area of the Scheduled Monument of The Hermitage, proximity to this asset will need to be taken into account. It also has other heritage interest and known archaeological potential.
- 50. The proposals submitted by the site promoter of the proposed ‘Garden Village’ at Stanmore are informed by evidence including an Archaeological and Heritage Technical Note.
- 51. With regard to the Scheduled Monument of The Hermitage the site promoter considers:
 - a. *“The land at the site makes no particular contribution to the significance of the Scheduled Monument of the Hermitage;*
 - b. *Its development wouldn’t have an adverse impact on the monument (as a result); and*
 - c. *In fact, if the development can deliver improvements to the monument in term of management, access, interpretation, presentation etc, it could in fact enhance the significance of the monument”.*
- 52. This is understood to be based on the findings of the Archaeological and Heritage Technical Note which concludes:
- 53. *“There is one designated heritage asset (as defined in Annex 2 of the NPPF) partly within the Site. This is The Hermitage scheduled monument (1004782), located in the far north-western corner. The details described in the scheduling citation indicate that all known archaeological remains related to the monument comprise caves and their entrances. There are no known above ground remains within the Site, with the entrances within Hermitage Hill Coppice located beyond the Site boundary to the west.*
- 54. *The above-ground remains of The Hermitage are therefore well contained within Hermitage Hill Coppice, which is also designated as ancient woodland. The arable fields within the Site are concluded to be a neutral element of the setting of the asset and make no contribution to its significance one way or the other. Hence, whilst further assessment will be required of emerging development proposals, it is considered that development within the Site could easily be*

accommodated without causing harm to the heritage significance of The Hermitage scheduled monument. Indeed, there is no reason to believe that the Site could not come forward in a way that would either preserve or actively enhance the significance of this Scheduled Monument, as it is within the applicant's control and could hence be subject to improved management and presentation through the development".

55. However, it is noted that this position varies from that within an earlier iteration of the Archaeological and Heritage Technical Note submitted, which concluded:
56. *"There is one designated heritage asset (as defined in Annex 2 of the NPPF) within the Site. This is The Hermitage scheduled monument (1004782), located in the far north-western corner of the Site. This asset would represent an 'in principle' constraint to development in this area, owing to a presumption in favour of its preservation and any physical impact on the fabric of the scheduled monument, would require Scheduled Monument Consent. The details described in the schedule citation suggest that all known archaeological remains comprise the caves and their entrances and there are no known above ground remains, other than the cave entrances within Hermitage Hill Coppice.*
57. *Development will need to be excluded from the scheduled area and the requirement for any buffer to this established through consultation with Historic England, although given the nature of the protected remains no requirement for a substantial buffer is envisaged. Nevertheless, any development in the vicinity of the monument would need to be informed by detailed archaeological survey, the scope of which would need to be agreed in advance with HE and the Shropshire Council Historic Environment Team.*
58. *The Hermitage is well contained within Hermitage Hill Coppice, which is also designated as ancient woodland. The arable fields within the Site provide a neutral contribution to this setting. Therefore, whilst further assessment would be required of emerging development proposals, in order to feed into positive design measures, it is considered that development within the Site could be accommodated without causing harm to the heritage significance of The Hermitage scheduled monument."*
59. Whilst the revised line of argument is understood, this does not remove the fact that, at present, part of the Scheduled area extends onto the proposed development site. Until such time as the Scheduling is amended it does therefore constitute an in principle constraint that should be considered in the overall balance.
60. Furthermore, whilst any impacts on the significance of the Scheduled Monument could potentially be mitigated by incorporating a buffer to provide a stand-off from the Scheduled area, this requires discussion and agreement with Historic England. It is also noted that the most recent Concept Masterplan, indicates that the size of the buffer zone proposed for the Scheduled area has reduced over that which was proposed in previous versions.
61. When responding to the 'Regulation 18' Preferred Sites Consultation, Historic England stated in relation to the proposed 'Garden Village' at Stanmore (our emphasis): **"Land at Stanmore - Historic England welcomes the Masterplan led approach to the development of the preferred sites identified at Land at Stanmore and would recommend that a criteria based policy is developed for the site as the Plan progresses to ensure that aims and aspirations for the site are clear to any future developer. We would recommend that any application should**

be accompanied by a heritage statement, and relevant assessments where appropriate, in order for heritage to inform the Masterplan at the outset.

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

62. It is acknowledged that the extent of the proposed ‘Garden Village’ at Stanmore has been revised and the extent of P54 included within the proposal has significantly reduced. However, the entirety of parcel P56 remains part of the proposal.
63. Representatives of Historic England have since undertaken a site visit (16th December 2020). Following this site visit and consideration of the most recent Concept Masterplan, they have updated their position with regard to the potential harm to the setting of The Hermitage Scheduled Monument. Specifically, they have concluded that *“the harm to the Scheduled Monument can be mitigated through the proposed provision of amenity/play space creating a buffer to The Hermitage.”*
64. However, Historic England have also indicated that *“they would be more comfortable with the Masterplan if the block of proposed low density housing were removed from between the amenity and play space block to its’ north and the woodland and green infrastructure to its’ south, and replaced with further green space, to create a buffer to The Hermitage all along the western boundary of the site and ensure a higher level of mitigation than that currently proposed.”*
65. They have also specified that *“the level of harm to the Hermitage SM that would result from the proposed masterplan (with the amendments recommended by Historic England) for Stanmore Garden Village, that you have shared with us, would be ‘less than substantial’.”* As such, the tests set out in Paragraphs 193, 194 and 196 of The Framework are engaged and the Council is required to place great weight upon the assets conservation.
66. With regard to other heritage assets, the Archaeological and Heritage Technical Note concludes:
67. *“No potential for any adverse impact has been identified on any other designated heritage assets outside the Site and so, in this respect, the presence of designated heritage assets outwith the Site does not represent a constraint to the Site’s development or its capacity for development and, should not impede its allocation”.*
68. Again, it is noted that this position varies from that within an earlier iteration of the Archaeological and Heritage Technical Note submitted, which concluded:
69. *“There is some potential for development within the Site to have a small impact on the Grade II listed Swancote Farm House, Stanmore Hall and Burcote Villa, which lie in the vicinity of the Site through changes to their setting. However, the level of this potential effect would be low: limited to glimpsed intervisibility between the Site and the upper parts of these buildings. Further assessment*

would be required of emerging development proposals, in tandem with the Landscape and Visual Impact Assessment, in order to feed in to positive design measures in response to the setting of the assets. However, land within the Site has little bearing on the heritage significance of these assets and intervisibility between the Site and the assets is extensively filtered by mature trees and intervening development. It is thus considered that development within the Site could be accommodated without causing harm to the heritage significance of any of these designated heritage assets, therefore, this should not be a determinative factor in any planning application”.

70. It is assumed that amendments to the extent of the site have reduced the scope of other heritage assets relevant for consideration, although proximity to Stanmore Hall remains the same.
71. The land at the proposed ‘Garden Village’ at Tasley includes the Grade II Listed The Leasowes and the former Farm House at The Leasowes. It also includes the non-designated historic farmsteads at Footbridge Farm, Hundred House Farm and Roundthorn Farm. Furthermore, due to the scale of the site it could have archaeological potential.
72. The proposals submitted by the site promoter of the proposed ‘Garden Village’ at Tasley are informed by evidence including a Heritage Desk-Based Assessment which indicates that less than substantial harm would arise to the significance of these designated heritage assets as a result of the changes that would occur to their settings. Because Sections 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests set out in Paragraphs 193, 194 and 196 of The Framework are therefore engaged, the Council is required to place great weight upon their conservation.
73. Following consultation on the ‘Regulation 18’ Pre-Submission Draft of the Shropshire Local Plan, Historic England stated in relation to the proposed ‘Garden Village’ at Tasley: *“...I can confirm that HE has no objection to the proposed allocation site at Tasley (BRD030). We note that there is potential to affect the GII Listed Buildings and associated historic landscape character but that this is clearly addressed in the proposed Development Guidelines set out in the Reg 18 pre-Submission Plan”.*
74. Historic England representations on the ‘Regulation 19’ Pre-Submission Draft of the Shropshire Local Plan do not substantially change this position.
75. Having considered available information on this matter, including that on the potential impacts of each site on designated and non-designated heritage assets, the significance of these heritage assets, and the ability to mitigate any impacts through appropriate design and layout, effective use of green infrastructure and any other appropriate mitigation, it is considered that, on balance, the proposed ‘Garden Villages’ represent similar levels of risk to heritage assets.
76. Both are of sufficient size to have archaeological potential and both are expected to result in less than substantial harm to the significance of designated heritage assets and/or their settings, with the land at the proposed ‘Garden Village’ at Stanmore resulting in less than substantial harm to a scheduled monument, an asset considered of the highest significance, together with potential the total loss of significance to a number of non-designed heritage assets with archaeological interest; and the proposed ‘Garden Village’ at Tasley containing several heritage

assets, including two Grade II listed buildings, with less than substantial harm occurring to these designated assets.

Ecology

77. Paragraphs 170, 171, 174 and 175 of The Framework state:

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

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

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

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

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

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

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

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

78. The proposed ‘Garden Village’ at Stanmore does not contain any statutory natural environment designations. However, it lies immediately adjacent to ancient woodland, which runs along Hermitage Ridge to the west of the site between it and the existing built form of Bridgnorth. This would need to be appropriately buffered and protected to avoid loss or deterioration in accordance with The Framework which states in Paragraph 175 c): *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*.
79. With regard to the wholly exceptional reasons, Footnote 58 of The Framework states *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat”*.
80. Proposals submitted by the site promoter (informed by evidence including an Ecology Technical Note, Arboricultural Appraisal and a note on pedestrian footpath connections), include a 15m buffer zone of the ancient woodland.
81. Government circulars for ancient woodland highlight that a buffer zone to ancient woodland should be at least 15m, to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, a larger buffer zone is likely to be required. It is noted that the Woodlands Trust promotes, as a minimum, a 50m precautionary buffer zone. There does not appear to have been any detailed consideration or justification for using the minimum buffer zone within the site promoters submissions, therefore the extent of an appropriate buffer zone will require careful consideration.
82. Proposals submitted by the site promoter (informed by evidence including an Ecology Technical Note, Arboricultural Appraisal and a note on pedestrian footpath connections), also include pedestrian and cycle links across Hermitage Ridge (following the line of existing Public Right of Way and Pylons) and consider it should be possible to improve and widen existing footways to Wolverhampton and Stourbridge Roads (north and south of the site), with all necessary land in the promoter’s ownership.
83. The Ecology Technical Note states *“as part of the development proposals, a footpath is to be created through the woodland, linking the proposed development to existing development to the west. This may result in some limited fragmentation of the woodland and it is considered that such impacts can*

be offset by additional woodland planting on the edges, and either having no lighting of the pathway or the implementation of a sensitive lighting strategy”.

84. It also states *“any increases in recreational pressure on the woodland can be mitigated for through continued management of the existing footpath network and sympathetic management of the woodland to maintain and enhance its ecological value. All development will be offset from the woodland by 15m, as per Natural England’s standing advice. This buffer will be planted with native tree species”.*
85. The Arboricultural Appraisal includes *“it is acknowledged that the proposed boardwalk connection will require low impact development within the Ancient Woodland designation, however the site of such shall be limited to the current clearing beneath the overhead cables and all work shall be undertaken outside the designated root protection areas of the adjacent trees. The future development shall be supported by extensive engineering details relating to the proposed access and a detailed Woodland Management Plan shall be secured and delivered accordingly”.*
86. The note on pedestrian footpath connections documents an opportunity to provide the aforementioned boardwalk connection to *“even out the gradient whilst limiting tree loss and damage to roots”.*
87. These proposals require very careful consideration as there is very real concern that they could lead to the loss or deterioration of irreplaceable habitats. This consideration includes:
 - a. Whether there would be any fragmentation of the ancient woodland, given the Ecology Technical Note recognises the risk of *“limited fragmentation”.*
 - b. What engineering works would be required to establish appropriate gradients/surfaces for pedestrians and cyclists – it is noted that a wooden walkway is proposed as a potential means of achieving this, but if cut and fill due to gradients is required to establish such a walkway, it would be very damaging to groundflora and tree roots and as such the creation of this walkway has the potential to erode the current woodland groundflora and fauna. It should be noted that ancient woodland is a very diverse community of specialist species from mammals to micro-organisms as well as the trees. Using the area under the powerline could reduce tree loss but shrubs and woodland groundflora may well be surviving there – shrubs tend to be coppiced once they reach a certain height under the lines – assessment of any damage would require detailed ecological survey work. Ultimately, this area remains part of the ancient woodland designation.
 - c. Whether lighting is required to make routes appropriate for pedestrians and cyclists. It is noted that the Ecology Technical Note proposed *“having no lighting of the pathway or the implementation of a sensitive lighting strategy”.* If no lighting was provided, would such routes be safe and encourage pedestrian and cyclist use. If lighting is provided this could have a detrimental effect on species and will need further consideration.
 - d. Increased recreational pressure. The additional information provided suggests upgrading footpaths and leaning towards improving recreation in the ancient woodland. It is recognised that there are public rights of way and informal pathways through the wood where the public can enjoy the ancient woodland, which does offer good recreational value. However, the proposed improved

access to the woodland will require a robust management plan to avoid deterioration of the woodland.

e. If there is loss or deterioration, what wholly exceptional reasons exist?

88. It is noted that the National Planning Practice Guidance on Ancient Woodland, Ancient Trees and Veteran Trees: Protecting Them from Development, states:

“You and the developer should identify ways to avoid negative effects on ancient woodland or ancient and veteran trees. This could include selecting an alternative site for development or redesigning the scheme.

You should decide on the weight given to ancient woodland and ancient and veteran trees in planning decisions on a case-by-case basis. You should do this by taking account of the NPPF and relevant development plan policies.

If you decide to grant planning permission that results in unavoidable loss or deterioration, you should use planning conditions or obligations to make sure the developer:

- *avoids damage*
- *mitigates against damage*
- *compensates for loss or damage (use as a last resort)*

Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.”

89. Other options for establishing pedestrian and cycle links between the proposed ‘Garden Village’ at Stanmore and Bridgnorth are identified and could be utilised, but whether these would be attractive to pedestrians and cyclists, particularly given the potential gradient and nature of these routes is in question and requires careful consideration.

90. Ultimately, it is considered that the ability to provide effective pedestrian and cyclist links between the proposed ‘Garden Village’ at Stanmore and Bridgnorth requires very careful consideration given the gradient and nature of roads and footpaths between Bridgnorth and the site and the presence of ancient woodland on Hermitage Ridge.

91. The proposed ‘Garden Village’ at Stanmore also falls within an impact zone for two SSSI’s, although the Ecology Technical Note submitted by the site promoters explains that there is no direct hydrological or terrestrial connectivity between the site and one of the SSSI’s and the other is designated for geological reasons, this is noted. The site is also in proximity of non-statutory designated wildlife sites although it is considered that any impacts can be appropriately managed including through on-site Green Infrastructure and open space.

92. The proposed ‘Garden Village’ at Stanmore also includes areas within environmental networks and could contain protected species and priority habitats. It is considered that the site is of sufficient size that the design and layout of development could reflect these issues.

93. Proposals submitted for the proposed Garden Village at Tasley are informed by evidence including a Preliminary Ecological Assessment. The site does not contain any statutory natural environment designations. However, it is located within the Impact Risk Zone for two SSSI’s. Discussions with Ecology Officers at Shropshire Council and initial discussions with Natural England indicate that

risks can be managed through appropriate design, layout and construction of the development.

94. The proposed 'Garden Village' at Tasley is also in proximity of non-statutory designated wildlife sites, including a new habitat created as a result of the restoration of nearby Bridgwalton Quarry, however it is considered that any impacts can be appropriately managed including through on-site Green Infrastructure and open space.
95. The proposed 'Garden Village' at Tasley also includes areas within environmental networks and could contain protected species and priority habitats. It is considered that the site is of sufficient size that the design and layout of development could reflect these issues.
96. Having considered available information on this matter, it is considered that the proposed 'Garden Village' at Tasley represents less risk to ecological assets than the proposed 'Garden Village' at Stanmore.

Landscape and Visual Sensitivity²

97. Paragraphs 127 and 170 of The Framework state:

“Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;...”*

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

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;...”*

98. According to Shropshire Council's Landscape and Visual Sensitivity Assessment, the majority of the land at the proposed 'Garden Village' at Stanmore is located within a landscape parcel which has medium landscape and visual sensitivity to housing and employment. A very small portion of the most easterly element of the site, understood to be proposed exclusively for employment development as an expansion of Stanmore Industrial Estate, has

² Landscape parcels identified and assessed within the Landscape and Visual Sensitivity Study undertaken for Shropshire

medium-high landscape and visual sensitivity to housing and high landscape and visual sensitivity to employment.

99. According to Shropshire Council's Landscape and Visual Sensitivity Assessment, the land at the proposed 'Garden Village' at Tasley is primarily located within a landscape parcel assessed as having medium landscape and visual sensitivity to housing and medium-high landscape and visual sensitivity to employment. A portion of the site extends beyond the area assessed.
100. The promoters of both the proposed 'Garden Village' at Stanmore and the 'Garden Village' at Tasley have provided site specific Landscape and Visual Appraisals.
101. Furthermore, the promoters of the proposed 'Garden Village' at Stanmore have provided a site comparison on Landscape and Visual Matters, whilst the promoters of the proposed 'Garden Village' at Tasley have provided a Landscape and Visual Review of proposed 'Garden Village' at Stanmore.
102. A review of this material has been undertaken and represents an Appendix to this document. In summary:

a. Proposed 'Garden Village' at Stanmore Landscape and Visual Appraisal:

The LVA has a methodology which follows best practice set out in GLVIA3³, however it does not apply this comprehensively to the assessment of effects and no assessment of cumulative effects has been undertaken. We have identified a number of concerns which we recommend be addressed in a revised LVA, comprising; the stated level of scale of the proposals; omission of assessments for adjoining Landscape Character Types and the Stanmore Country Park as a landscape receptor, and the description of the site as being urban fringe.

Limited mitigation information is provided and there are insufficient linkages between predicted effects and proposed mitigation.

b. Proposed 'Garden Village' at Tasley Landscape and Visual Appraisal:

The LVA has a methodology which follows best practice set out in GLVIA3, however it does not apply this comprehensively to the assessment of effects and no assessment of cumulative effects has been undertaken. We have identified a number of concerns which we recommend be addressed in a revised LVA, comprising; absence of reference to the Oldbury Conservation Area in the assessment of landscape and visual sensitivity; overstating the negative effects of existing buildings on the site, and issues of presentation in the figures.

c. Site comparison on Landscape and Visual Matters by the promoters of the proposed 'Garden Village' at Stanmore

We disagree with the challenges in the review that: residents occupying listed buildings have an enhanced visual sensitivity; and there is extensive visibility of the Tasley site from the elevated land to the south west.

d. Landscape and Visual Review of proposed 'Garden Village' at Stanmore by the promoters of the proposed 'Garden Village' at Tasley

³ *Guidelines for Landscape and Visual Impact Assessment; The Landscape Institute and The Institute for Environmental Management and Assessment; 3rd Edition, 2013*

We agree with the challenge in this review that the assessment in the LVA of landscape sensitivity for the site should be increased from medium to medium-high, based on the judgements and narration set out in the SLVSS.

103. Ultimately it is important to recognise that the Local Plan Review process identifies site allocations. Where sites are allocated within a Local Plan, prior to any development taking place, proposals are subject to a more detailed Planning Application process. Both the proposed 'Garden Village' at Stanmore and the proposed 'Garden Village' at Tasley will need to be subject to more detailed Landscape and Visual Assessment which fully complies with the best practice set out in GLVIA3 and responds to the issues identified above.
104. However, it is considered that there is sufficient information available through Shropshire Council's Landscape and Visual Sensitivity Assessment and available site-specific information to give due consideration to landscape and visual impact within the site assessment process.
105. Based on available information regarding landscape and visual sensitivity, it is considered that the two proposals are broadly neutral in relation to landscape and visual impact of residential development and that the proposed 'Garden Village' at Stanmore is less sensitive in relation to landscape and visual impact of employment development than the proposed 'Garden Village' at Tasley.

Agricultural Land Quality

106. The Framework defines the best and most versatile agricultural land as "*Land in grades 1, 2 and 3a of the Agricultural Land Classification*". Paragraph 170 of The Framework states:

"170. Planning policies and decisions should contribute to and enhance the natural and local environment by:... b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland..."

107. According to the Natural England Agricultural Land Classification Map⁴, the agricultural land quality of the proposed 'Garden Village' at Stanmore is primarily grade 2, but also includes small areas of grade 3. The agricultural land quality of the proposed 'Garden Village' at Tasley is grade 3.
108. It is noted that the promoters of the proposed 'Garden Village' at Stanmore have provided an Agricultural Land Classification Technical Note which suggests that based on observations made by the Land Agent that "*while reasonably fertile*" the site is "*formed on sandstone and, being sandy, dries out very quickly in the absence of rain. Typically, this would infer a classification of 3(a), or 3(b) is likely to be established if a fuller sampling survey is undertaken*". In the absence of a sampling survey, it is considered that a precautionary approach must be applied.

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

109. As such, applying a precautionary approach, it is considered that both the proposed 'Garden Village' at Stanmore and the proposed 'Garden Village' at Tasley have the potential to be amongst the best and most versatile agricultural land. Although, it should be noted that according to the Natural England Agricultural Land Classification Map, applying the precautionary principle, there is very little land around Bridgnorth which does not have the potential to be amongst the best and most versatile agricultural land.
110. It is therefore considered that this matter is broadly neutral so far as considering the competing merits of the two proposals.

Flood Risk

111. Paragraphs 155, 157 and 158 The Framework state:

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

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

a) applying the sequential test and then, if necessary, the exception test as set out below;

b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and

d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

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

112. The land at the proposed 'Garden Village' proposal at Stanmore is located within flood zone 1 (lowest risk from river flooding). It contains small areas within the 1 in 1,000 surface water flood risk but the remainder of the site is not within an identified flood risk zone. It is considered that the site is of sufficient size that following the use of sustainable drainage (SUDs) and attenuation ponds, development can avoid any areas with residual surface water flood risk.
113. The land at the proposed 'Garden Village' at Tasley is primarily located within flood zone 1 (lowest risk from river flooding). Areas along the sites western and southern boundary are located in flood zones 2 and/or 3 (higher risk from river flooding). It is considered that the site is of sufficient size that the development can avoid elements of the site in flood zones 2 and/or 3. The site also contains small areas within the 1 in 30, 1 in 100 and 1 in 1,000 surface water flood risk zones but the remainder of the site is not within an identified surface water flood

risk zone. It is considered that the site is of sufficient size that following the use of SUDs and attenuation ponds, development can avoid any areas with residual surface water flood risk.

114. As such it is considered that both 'Garden Village' proposals would represent development in areas with the lowest risk of flooding. It is therefore considered that this matter is broadly neutral so far as considering the competing merits of the two proposals.

Water Quality

115. The land at the proposed 'Garden Village' at Stanmore is primarily located outside of identified source protection zones, although much of the most easterly element of the site, understood to be proposed exclusively for employment development as an expansion of Stanmore Industrial Estate, is located within Source Protection Zone 3. However, it is considered that this issue could be managed through appropriate design and construction of development.
116. The land at the proposed 'Garden Village' at Tasley is not located within a source protection zone.
117. It is therefore considered that this matter is broadly neutral so far as considering the competing merits of the two proposals.

Public Protection

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

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

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

119. The land at the proposed 'Garden Village' at Stanmore is close to sources of road and commercial noise and potential future noise from other commercial uses on the employment land proposed within the site promotion itself. However, it is considered that this can be managed through design and layout of the development and use of green infrastructure buffering.
120. The land at the proposed 'Garden Village' at Tasley contains the site of a current Planning Application for Poultry Units. It is currently unclear whether this Planning Application would be temporarily implemented if Planning Permission is granted. However, given that the land subject to this Planning Application is within the site promotion, it is considered that this could be appropriately mitigated through inclusion of a guideline stipulating that before occupation of

the first dwelling on the site, any poultry units operating on the site or indeed land within the wider site promotion will cease operation.

121. It is understood that land at the proposed 'Garden Village' at Tasley is also located over known foul water private drainage facilities to the Punch Bowl and other residential properties, but this could be appropriately managed if the site were developed.
122. The land at the proposed 'Garden Village' at Tasley is also close to sources of current road and commercial noise and potential future noise and odour from the relocated livestock market (the adjacent employment allocation includes land specifically for the livestock market and associated landscaping), other commercial uses on the existing employment allocation and potential commercial uses on the employment land proposed within the site promotion itself. It is noted that the operators of the livestock market have expressed concern regarding the impact of development at the 'Garden Village' on any future relocated livestock market. These issues require careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering.
123. The land at the proposed 'Garden Village' at Tasley is in proximity to quarries at Morville and Bridgwalton. It is considered that through the use of appropriate buffers this proximity can be mitigated.
124. The proposed 'Garden Village' at Tasley is in proximity to more sources of noise, odour and dust than the 'Garden Village at Stanmore, which weighs in favour of the 'Garden Village at Stanmore'. However, it is considered that these issues can be appropriately mitigated for both sites.

Other Strategic Considerations

125. The promoters of the proposed 'Garden Village' at Stanmore have provided an Affordable Housing Proposal document, within which they propose to over-provide affordable housing compared with current and proposed policy requirements in this location. Specifically, they have proposed 30% provision rather than the 20% required/proposed. It is understood that this includes *"Housing for sale or rent with 'key worker' (to be defined) or 'local employment' (working within 5km of the property) restriction in the property title"*, for this to be considered affordable housing it would need to demonstrate compliance with definition of affordable housing provided within The Framework.
126. It is understood that the promoters of the proposed 'Garden Village' at Tasley are proposing a policy compliant level of affordable housing provision (20%).
127. This requires due consideration. Assuming that the 30% affordable housing provision proposed on the proposed 'Garden Village' at Stanmore all complies with the definition of affordable housing and is viable and deliverable, this weighs in favour of this site.
128. The promoters of the proposed 'Garden Village' at Stanmore have noted that Shropshire Council has set ambitious targets for carbon emissions to reduce Climate Change and share these aspirations. They have stated they can reduce carbon emissions from any development of the site through use of a Design Manual which will ensure that the proposed 'Garden Village' at Stanmore complies with or exceeds Shropshire's targets for low or zero carbon emission -

using available, innovative renewable technologies such as ground source, solar and battery storage - and built to satisfy highest standards of energy efficiency.

129. The land at the proposed 'Garden Village' at Tasley would need to comply with Shropshire Council policies on energy efficiency and use of renewable energy technologies.
130. This requires due consideration and assuming proposals are viable and deliverable would weigh in favour of the proposed 'Garden Village' at Stanmore.
131. The land at the proposed 'Garden Village' at Stanmore benefits from proximity to the Stanmore Industrial Estate and offers the potential for the site to expand.
132. The land at the proposed 'Garden Village' at Tasley provides an opportunity to establish a new employment site to the west of the town, this could provide balance as much of the employment is currently located to the east.
133. It is therefore considered that this matter is broadly neutral so far as considering the competing merits of the two proposals.

Planning Balance

134. Having given careful consideration to these issues and all other available information, it is considered that the proposed 'Garden Village' at Tasley represents the most appropriate location to include within the Draft Shropshire Local Plan as a proposed mixed-use allocation to meet the needs of Bridgnorth and its wider hinterland during the proposed Local Plan Period. However, given that the total site size and the fact it has capacity for considerable development, it is proposed that only a proportion of the overall site should be allocated for development within the emerging Draft Shropshire Local Plan, with the remainder of the site having potential to be brought forward for development in future reviews of the Local Plan.
135. The main factors that have informed this decision include:

Green Belt

136. The land at the proposed 'Garden Village' at Tasley is not located within the Green Belt, whilst the land at the proposed 'Garden Village' at Stanmore is. The previously referenced Paragraph's 136 - 138 of The Framework include "*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*".
137. It is considered that based on the current information provided and assessed by Council officers, the proposed 'Garden Village' at Tasley would represent sustainable development and is capable of meeting the growth needs of the Town and would offer wider benefits to the community. As such it is considered the proposed 'Garden Village' at Tasley in no way represents a last resort, but rather a reasonable and sustainable option to meet the growth needs of Bridgnorth.

Highways

138. Given the information provided within the various supporting transport assessments (including the initial strategic highways review of these two potential 'Garden Village' sites undertaken by Shropshire Council) and the scale of the developments proposed, it is considered that both the proposed 'Garden Village' at Stanmore and the proposed 'Garden Village' at Tasley can provide appropriate vehicular accesses and are capable of making necessary improvements to the highway network. Any such works should be informed by appropriate Strategic and Local Highway Transport Assessments.
139. It is also considered that both the proposed 'Garden Village' at Stanmore and the proposed 'Garden Village' at Tasley offer opportunities to integrate appropriate public transport links.
140. However, it is considered that the proposed 'Garden Village' at Tasley provides greater opportunities to make localised improvements to the surrounding network to ensure the new development is not segregated from the existing settlement of Bridgnorth, in particular there appears to be more opportunities for effective improvements to pedestrian and cycle facilities, given the location and relationship of each site with the existing built form of the settlement.
141. Furthermore, specific concern exists regarding the potential for impact on ancient woodland of the proposed 'Garden Village' at Stanmore, if the methods of establishing pedestrian and cyclist links proposed by the site promoters are pursued (considered further under the Ecology heading). There is also concern, given gradients and lighting, about the potential useability of such routes for use by all types of users, as highlighted within the initial strategic highways review of these two potential 'Garden Village' sites, undertaken by Shropshire Council. However, for clarity, even assuming that these proposals are suitable and achievable, it is considered that the proposed 'Garden Village' at Tasley provides more opportunities for effective improvements to pedestrian and cycle facilities.

Heritage

142. The land at the proposed 'Garden Village' at Tasley contains several heritage assets, including two Grade II listed buildings. A Heritage Assessment provided by the Promoters indicates that less than substantial harm would arise to the significance of these designated heritage assets as a result of the changes that would occur to their settings. Because Sections 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests set out in Paragraphs 193, 194 and 196 of The Framework are therefore engaged, the Council is required to place great weight upon their conservation.
143. It is noted that the promoters of the proposed 'Garden Village' at Stanmore consider that:
 - a. The land at the site makes no particular contribution to the significance of the Scheduled Monument of the Hermitage;
 - b. Its development wouldn't have an adverse impact on the monument (as a result); and
 - c. In fact, if the development can deliver improvements to the monument in term of management, access, interpretation, presentation etc, it could in fact enhance the significance of the monument.
 - d. No potential for any adverse impact has been identified on any other designated heritage assets outside the Site.

144. This position is contradictory to that of Historic England, who have indicated that development at this location would, subject to specified amendments to the development proposals identified within the most recent Concept Masterplan, cause less than substantial harm to the significance of The Hermitage Scheduled Monument. As the Government's statutory advisor for the historic environment, the decision taker has to afford their advice significant weight.
145. As such, the tests set out in Paragraphs 193, 194 and 196 of The Framework are engaged and the Council is required to place great weight upon its conservation.
146. Having considered available information, including that on the potential impacts of each site on heritage assets, the significance of these designated and non-designated heritage assets, and the ability to mitigate any impacts through appropriate design and layout, effective use of green infrastructure and any other appropriate mitigation, it is considered that, on balance, the proposed 'Garden Villages' represent similar levels of risk to heritage assets.
147. Both are of sufficient size to have archaeological potential and both are expected to result in less than substantial harm to the significance of designated heritage assets and/or their settings, with the land at the proposed 'Garden Village' at Stanmore resulting in less than substantial harm to a scheduled monument, an asset considered of the highest significance; and the proposed 'Garden Village' at Tasley containing several heritage assets, including two Grade II listed buildings, with less than substantial harm occurring to these designated assets.
148. With regard to the requirement to place great weight upon conservation of heritage assets, whilst this requirement for both sites is acknowledged, it is considered that through appropriate design and layout of development and incorporation of effective Green Infrastructure, impacts on heritage assets from either site can be minimised. Further, it is considered that the significant public benefits of meeting housing and employment needs of Bridgnorth and its hinterland would outweigh the harm that would be caused to the significance of these assets.
149. Therefore, having placed great weight on heritage matters within the assessment process, and having taken into account Historic England's advice, it remains the officer view that on balance, given wider considerations, the proposed 'Garden Village' at Tasley remains the more appropriate site for allocation.

Ecology

150. Through appropriate construction, design and layout of development and incorporation of effective Green Infrastructure, it is considered that the ecology assets on and in proximity of the land at the proposed 'Garden Village' at Tasley can be safeguarded.
151. Whilst this is also considered the case for the land at the proposed 'Garden Village' at Stanmore, appropriate safeguarding of the ancient woodland along The Hermitage would be more difficult and require very careful consideration. Necessary safeguards would include an appropriate buffer zone, the extent of which would require careful consideration and could cause further separation of the site from the built form of Bridgnorth. Necessary safeguards would also very likely conflict with proposals by the site promoter to provide pedestrian and cycle links through the ancient woodland. As such this would likely exacerbate

concerns regarding the ability to achieve effective pedestrian and cycle links from the site into the town.

Landscape and Visual Sensitivity

152. According to the Landscape and Visual Sensitivity Assessment undertaken for Shropshire, the landscape and visual sensitivity of the parcels containing the majority of the two 'Garden Villages' are not dissimilar with regard to residential development, whilst the parcel containing the proposed 'Garden Village' at Tasley is identified as being more sensitive to employment development than the main parcel containing the proposed 'Garden Village' at Stanmore. This is noted.
153. However, having given this and also available site-specific information careful consideration, it is considered that the landscape and visual impacts of both the proposed 'Garden Village' at Tasley and the proposed 'Garden Village' at Stanmore can be appropriately mitigated through design, layout, retention of mature trees, hedgerows, structural vegetation and key existing green infrastructure corridors and provision of new green infrastructure.

Agricultural Land Quality

154. Applying the precautionary principle, based on the Natural England Agricultural Land Classification Map, both the proposed 'Garden Village' at Tasley and the proposed 'Garden Village' at Stanmore have the potential to be amongst the best and most versatile agricultural land. Although, it should be noted that according to the Natural England Agricultural Land Classification Map, applying the precautionary principle, there is very little land around Bridgnorth which does not have the potential to be amongst the best and most versatile agricultural land.

Flood Risk

155. The land at the proposed 'Garden Village' proposal at Stanmore is located within flood zone 1 (lowest risk from river flooding). It contains small areas within the 1 in 1,000 surface water flood risk but the remainder of the site is not within an identified flood risk zone. It is considered that the site is of sufficient size that following the use of sustainable drainage (SUDs) and attenuation ponds, development can avoid any areas with residual surface water flood risk.
156. The land at the proposed 'Garden Village' proposal at Tasley is primarily located within flood zone 1 (lowest risk from river flooding). Areas along the sites western and southern boundary are located in flood zones 2 and/or 3 (higher risk from river flooding). It is considered that the site is of sufficient size that the development can avoid elements of the site in flood zones 2 and/or 3. The site also contains small areas within the 1 in 30, 1 in 100 and 1 in 1,000 surface water flood risk zones but the remainder of the site is not within an identified surface water flood risk zone. It is considered that the site is of sufficient size that following the use of SUDs and attenuation ponds, development can avoid any areas with residual surface water flood risk.
157. As such it is considered that both 'Garden Village' proposals would represent development in areas with the lowest risk of flooding.

Water Quality

158. The land at the proposed 'Garden Village' at Tasley is not located within a source protection zone.
159. The land at the proposed 'Garden Village' at Stanmore is primarily located outside of identified source protection zones, although much of the most easterly element of the site, understood to be proposed exclusively for employment development as an expansion of Stanmore Industrial Estate, is located within Source Protection Zone 3. However, it is considered that this issue could be managed through appropriate design and construction of development.

Public Protection

160. Whilst the land at the proposed 'Garden Village' at Tasley is in proximity to roads, current and future employment (including the relocated livestock market), quarries and the site itself contains land subject to a current Planning Application for Poultry Units, which are sources of noise, dust and odour, it is considered that through appropriate site guidelines, design and layout of development and use of effective green infrastructure this can be mitigated.
161. It is acknowledged that the land at the proposed 'Garden Village' at Stanmore is in proximity to less sources of noise and no obvious sources of dust or odour.

Other Strategic Considerations

162. The proposed 'Garden Village' at Stanmore has proposed to 'over-provide' affordable housing at 30% provision rather than the current and proposed policy requirement of 20% (assuming proposed housing types meet the definition of affordable housing provided within The Framework and such provision is viable). The proposed 'Garden Village' at Tasley has proposed a policy compliant (20%) level of affordable housing. This has been given due consideration.
163. The promoters of the proposed 'Garden Village' at Stanmore stated they can reduce carbon emissions from any development of the site to ensure it complies with or exceeds Shropshire's targets for low or zero carbon. The land at the proposed 'Garden Village' at Tasley would need to comply with Shropshire Council policies on energy efficiency and use of renewable energy technologies. This has been given due consideration.
164. The proposed 'Garden Village' at Stanmore provides an opportunity to expand Stanmore Industrial Estate. The proposed 'Garden Village' at Tasley provides an opportunity to establish a new employment site to the west of the town, this could provide balance as much of the employment is currently located to the east. This has been given due consideration.

Conclusion

165. As such, having given careful consideration to these issues and all other available information, it is considered that the proposed 'Garden Village' at Tasley represents the most appropriate location to include within the Draft Shropshire Local Plan as a proposed mixed-use allocation to meet the needs of Bridgnorth and its wider hinterland during the proposed Local Plan Period. However, given that the total site size and the fact it has capacity for considerable development, it is proposed that only a proportion of the overall site should be allocated for development within the emerging Draft Shropshire Local

Plan, with the remainder of the site having potential to be brought forward for development in future reviews of the Local Plan.

166. Recognising the local importance and success of Stanmore Industrial Estate and the limited amount of land currently available for its expansion, it is also proposed that two elements of the proposed 'Garden Village' site at Stanmore, totalling around 11.5ha (currently within the Green Belt) are removed from Green Belt and allocated specifically for employment uses to allow the expansion of Stanmore Industrial Estate are included within the Draft Shropshire Local Plan as proposed site allocations.
167. In summary, recommendations for proposed site allocations in Bridgnorth are as follows:
- 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.
168. It is considered that these proposed site allocations would allow for and represent the sustainable development of Bridgnorth and as such are not considered a last resort. They would complement existing site allocations and windfall opportunities within the town and ensure that the development strategy for Bridgnorth is achieved. Crucially they would also facilitate the delivery of the housing and employment needed within the town.
169. The development of these proposed site allocations would be informed by approximate site provision figures and detailed site guidelines within the Local Plan. They would also need to comply with the policies within the Local Plan.
170. A key proposed site guideline relating to the proposed 'Garden Village' extension at Tasley is the requirement to prepare a vision, design code and masterplan, which will be informed by consultation with the local community and would subsequently be adopted as a Supplementary Planning Document (SPD) by Shropshire Council. This SPD would represent a significant material planning consideration and would be completed before granting any Planning Application for development of the site.
171. The proposed 'Garden Village' at Stanmore was once supported and judged to be acceptable, but the promotion of an alternative proposed 'Garden Village' at Tasley has required a comparison between the two, and for the reasons set out above, officers now judge that the proposed 'Garden Village' at Stanmore scheme should no longer be proposed for allocation, with the exception of the two areas of land proposed for identification specifically as employment allocations. The remainder of the land is proposed to remain as Green Belt.