



For Shropshire  
Council use

Respondent  
no:

## **Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan**

**Pre-Submission Draft (Final Plan)  
17 March 2014 – 28 April 2014**

### **Representations Form**

**Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:**

[www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev)

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at [www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev).

#### **Your details: Who is making this representation?**

Name:	
Organisation (if applicable):	Tasley Estates Ltd
Address:	
Email:	
Telephone:	

**If you are acting as an Agent, please use the following box to tell us who you are acting for:**

Name:	
Organisation (if applicable):	Stansgate Planning (KW/RJB/K/6225)
Address:	9 The Courtyard, Timothy's Bridge Road, Stratford upon Avon CV37 9NP
Email:	rachel@stansgate.co.uk
Telephone:	01789 414097

## Your Representations

**Please note, you must use a separate form for each representation you wish to make.**

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

**Schedule S3.1b: Employment Sites**

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Object</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

<b>Legally compliant</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

<b>Positively prepared</b>	
<b>Justified</b>	
<b>Effective</b>	
<b>Consistent with National Policy</b>	

**In the box below please specify your reason for supporting or objecting.**

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Tasley Estates support the allocation of land north of Wenlock Road and north of Church Lane for 200 dwellings, 6.3 ha for other uses and 300 dwellings respectively and supports the allocation of employment land south of the A458.

Tasley Estates control land north and west of Bridgnorth which includes all the area identified for housing and employment allocation:

- Land north of Wenlock Road (BRID001/BRID020b)
- Land north of Church Lane (BRID020a)
- Land south of A458 (ELR011/a and b)

With regard to the context, the Core Strategy was adopted following examination in February 2011. It was prepared in the context of national policy aimed at providing a sustainable pattern of development through urban focus and whilst predates the National Planning Policy Framework is generally consistent with the aims and objectives of the Framework. Policy CS1 sets out a strategy whereby around 40% of the overall housing target (11,000 houses) will be directed to market towns and other key centres reflecting the spatial vision of creating a network of vibrant and prosperous market towns. Bridgnorth is identified as a market town and to secure its future role and function it is a focus for development.

It is the largest settlement within the eastern zone of Shropshire, not just by population, but based on the high level of services and facilities available providing a service base for the town and the surrounding towns and villages. It has double the population of Shifnal, the next largest settlement in the eastern zone (11,400 and 5,600 respectively) and is the only principle centre. To fulfil its role as a main service centre Policy CS3 states:

*‘Bridgnorth will provide a focus for development within the constraints of its location*

*on the edge of the Green Belt and on the River Severn’.*

It follows therefore that as the third largest settlement in Shropshire and the largest in the east Shropshire zone, it is a focus for growth and that a substantial level of housing and employment should be directed to the town.

### ***Shropshire Employment Land Review 2011***

Technical background evidence to support the need for and the scale of the allocation is available in the Shropshire Employment Land Review 2011 (ELR). This considers the supply of land; an assessment of the local economy; provides a review of current land and; identifies and appraises the potential of new sites. With regard to the role of the Council in preparing the SAMDev it states:

*‘It is a responsibility of local and regional government to support and encourage economic growth. This includes the provision, initially through planning policy, of sufficient employment land and premises. This must be of the right scale, type, location, be readily available for development and be well related to the strategic or local highway network according to the nature of the site and the function of the settlement. One of the most important issues to consider is that the land must be allocated in sustainable locations and be readily capable of development’ (ELR paragraph 2.49).*

In looking at the existing employment base in Shropshire it concludes most businesses are industrial, there are twice as many factories and warehouses than there are offices (ELR paragraph 3.23) and there are more people living in Shropshire than jobs, average earning are lower than the national average and due to commuting patterns it is a low wage economy (paragraph 3.25). To address this

and take Shropshire forward the ELR identifies a need to retain people in Shropshire, to reduce out commuting and promote a home grown economy that keeps earning in the local area (paragraphs 4.25, 4.55-4.58). To have the best chance to address this, new allocations for employment are of paramount importance to give business the opportunity to locate and grow in the area. The scale of allocations and the characteristics of the sites proposed are of importance.

In the east Shropshire zone Bridgnorth is the hub of employment and in 2005 the Bridgnorth Employment Land Study identified a lack of units for medium sized firms as a constraint on the market. It found there was little obvious office demand, but local stakeholders felt that there would be demand for offices if some were built. A key market failure was identified as the lack of sites suitable for modern, high quality development with most of the existing employment areas catering for small, low cost operators looking for value orientated accommodation. The 2011 ELR found the servicing of the site at Chartwell Business Park alleviated land shortages and supply and demand in the east zone were currently in equilibrium (ELR 5.33). This land is available to meet current needs and is not without its problems. It does not cater for future growth.

Employment opportunities available in Bridgnorth currently are likely to be taken up and will not be available into the future such that it not appropriate to say there is adequate land available to meet future needs. An analysis of the current position of Stanmore Industrial Estate and Chartwell Business Park has been undertaken by Stansgate to consider the land available and what has been done to try to bring it forward. It is not lack of interest but rather constraints on the sites that have caused the issue.

The ELR recognises that in the east Shropshire zone virtually all land is available for development within 3 years (ELR paragraph 6.26). Therefore further supply must be identified to meet needs beyond this and to cover the plan period to 2026.

The ELR also looks at quality of the existing supply and scores sites based on their suitability. Whilst land at Chartwell Business Park scores very highly as it has been serviced, has road frontage on the approach to Bridgnorth and is readily available, overall it is clear the east zone has sites less suitable than all but the north west zone with a an average score of 67.5 compared to the north east as the best zone scoring 82.4 (ELR table 56). Clearly in considering the future, new allocations can address quality of supply by identification of a site that is better suited to modern business needs than that land currently available.

In considering the net amount of employment land allocations to be found to meet the Core Strategy requirement, after deducting commitments, the ELR balances all the research to conclude the quantity and quality of land that each zone can realistically provide. It concludes the east zone requires 18.72 ha (ELR paragraph 8.8). It finds that given the size and status of Bridgnorth in the Shropshire area, as the third largest settlement, that it under provides compared to other areas. In conclusion, the ELR recommends Bridgnorth has a 6.5 ha allocation (5 ha plus 1.5 ha to offset loss of part of Chartwell to retail use) (ELR paragraph 11.44).

In Bridgnorth the ELR recognises that much of the existing supply is to the east of the town and that further expansion of the existing employment areas are

constrained by Green Belt. A new area of development on the west of the town would help address Green Belt constraints on the expansion of the town (ELR paragraph 7.23).

The scale and location of the allocation in the SAMDev reflects the findings of the ELR. It addresses the need to find land to plan for the future; gives the opportunity to diversify the local economy to address the shortfall of offices; broadens the market through offering a different type of site; it offers the chance to stimulate new employment to create new jobs for local people to retain people in the local area and hence retain expenditure in the local area; ultimately it identifies a site that is well placed to provide a high quality business park to meet needs for the future.

### ***The allocation south of A458***

The allocation for employment land and residential development including mixed uses to support new development as now set out in SAMDev 2014 is the culmination of a number of years of consideration of the alternatives to accommodate growth in Bridgnorth and has been arrived at after rigorous investigation and testing through discussion between the Council, the landowners and local stakeholders. Many meetings have taken place and public consultation carried out to arrive at a solution that has regard to the following:

- The role of Bridgnorth as a Market Town as a focus for development
- Core Strategy vision of a flourishing Shropshire where Bridgnorth would be in a network of vibrant and prosperous market towns
- Core Strategy policies CS1 and CS3
- CS3 where additional development will help to strengthen Bridgnorth's economic role and maintain its role as a sustainable place
- constraints of the settlement in terms of Green Belt; flood plain; sensitive landscape; topography; significant visual and physical constraints; heritage assets; ancient woodland; wildlife sites and open space
- achieving a better balance between housing and employment
- public consultation which in early rounds favoured development in locations north and west of Bridgnorth but subsequently questioned scale

The allocation is to be regarded as a whole and the scale of development is justified in the context above along with the need to produce a viable and deliverable development that balances housing and employment. The emphasis in plan making is placed on the ability to deliver, rather than the identification of a target where no regard is given to a site with constraints that could stop development taking place. The SAMDev has considered the ability of Bridgnorth to deliver development on the scale proposed and has demonstrated land is available, suitable and achievable as identified.

To demonstrate deliverability of the scale proposed viability assessment has been

undertaken by chartered surveyors Thomas Lister. To support this representation letter dated 25 April 2014 from Thomas Lister is provided. It concludes:

*'In our view the development proposals which are being created by Tasley Estates Limited and as incorporated within SAMDev 2014 are both viable and deliverable based on our assessment of market conditions as well as a preliminary assessment of project costs undertaken by Robert West Consulting'*

**Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound?** You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

**Do you consider it necessary to attend and give evidence at the examination?**

Yes, I wish to give evidence about my representation at the examination.

☒

No, I wish to pursue my representations through this written representation.

☐

If you wish to attend the examination, please explain why you think this is necessary in the box below:

There is considerable public interest in the allocation with great concerns raised by the local community about the concentration of development at Tasley and crossing the A458, therefore as the site promoters it is important that a balanced view is presented by both supporters alongside the Council and objectors appearing.

**Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.**

When the SAMDev Plan has been submitted for examination	
When the Inspector's Report is published	
When the SAMDev Plan is adopted	

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto:Planning.policy@shropshire.gov.uk)

**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**Please note, we will acknowledge receipt of representations made by e-mail.**

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.

Our Ref: CT/jdc/TL809  
Date: 25<sup>th</sup> April 2014



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**For the Attention of Stewart Hickman**

Dear Sirs,

**Re: Proposed Mixed Use Development at Tasley, Bridgnorth**

Thomas Lister Limited are instructed by Tasley Estates Limited to undertake a review of proposals contained within the Shropshire Site Allocations and Management of Development (SAMDev) Plan Pre Submission Draft (Final Plan) : 17<sup>th</sup> March 2014 and contained with Schedule S3.1a : Housing Sites and Schedule 3.1b : Employment Sites which are within the ownership or control of Tasley Estates.

*A plan of the subject area is attached at Appendix I.*

It is confirmed that Thomas Lister are highly experienced in the undertaking of property appraisals for schemes throughout the country for both developers as well as over 50 Local Authorities including a range of valuation, delivery and viability advice. Chris Thomas is an RICS Registered Valuer.

I confirm that Chris Thomas has been working within the West Midlands property market for over 20 years including a range of projects within Bridgnorth and Shropshire and has undertaken an inspection of the subject sites.

It is commented in respect of the proposals as follows;

1. Description

The proposals cover a total area of about 45 hectares, situated on the north-west boundary of the existing settlement of Bridgnorth and are divided by the A458 which links to Shrewsbury to the north and Stourbridge to the south. The area is currently comprised of the existing Bridgnorth Livestock Market with the balance of the site currently within agricultural use. Existing access to the area is provided from Church Lane and Wenlock Road to the northern area of the sites and as agricultural access road only to the southern area.

Significant highways improvements will be required to support the development of all parts of the proposals.

2. Proposed Development of the Site

SAMDev 2014 has identified the proposed use of the subject areas as follows;

<b>Schedule S3.1a: Housing Sites</b>
Development of the allocated housing sites identified on the Policies Map should be in accordance with Policies CS6, CS9 and CS11, Policies MD2, MD3 and MD8, and the developer guidelines and approximate site provision figures set out in this schedule.



Allocated sites	Development Guidelines	Provision
Land north of Wenlock Road, Tasley (BRID001/BRID020b)	Mixed development of dwellings; retirement or supported housing accommodation; hotel; recreation space and neighbourhood centre comprising local facilities such as a petrol station with small convenience store, day care, health & fitness facilities. (this is subject to the relocation of the livestock market and provision of a fully serviced business and industrial estate on sites ELR011b and ELR011a respectively).	200 dwellings 6.3 Ha for other uses
Land north of Church Lane, Tasley (BRID020a)	Residential development, subject to provision of public open space that extends the environmental network and provision of direct access to a new roundabout on the A458 and the protection of Church Lane as a quiet lane shared with pedestrians.	300

#### **Schedule S3.1b: Employment Sites**

Development of the allocated employment sites identified on the Policies Map should be in accordance with Policies CS6, CS9, and CS14, Policies MD2, MD4 and MD8, and the development guidelines and approximate site provision areas set out in this schedule.

Allocated Sites	Development Guidelines	Provision (hectares)
Land at Tasley south of the A458 bypass (ELR011/a)	Development to deliver a business park comprising offices, industrial and warehousing uses (use classes B1, B2, B8 and appropriate sui generis uses) subject to access by means of a new roundabout on the A458 and adequate landscaping.	6.7 (Net of landscaping)
Land at Tasley south of A458 at Tasley (ELR011/b)	Allocated for the relocation of the existing livestock market together with its existing ancillary uses only. Suitable landscaping and woodland planting will be provided along the site edge.	6.6 (Net of landscaping)

The proposals are within the final stages of the Local Plan consultation process and it is anticipated that the Local Plan will be adopted in late 2014.

### **3. Project Deliverability**

Thomas Lister have been asked to consider issues associated with the deliverability of the proposals which are set out within SAMDev 2014 and would comment as follows;

- i. The proposals require for a comprehensive scheme to be undertaken as a result of the proposed relocation of the existing Livestock Market to a new site to the south of the A458 and the proposed access to a significant proportion of the residential areas to the north of the A458 will be accessed across the site of the existing Livestock Market. Accordingly there is a requirement for the scheme to be undertaken on a comprehensive basis.
- ii. The existing Livestock Market and other identified sites to the north of the A458 are all within the freehold ownership of Tasley Estates. It is confirmed that land to the south of the A458 is held under option by Tasley Estates with such options having in excess of 20 years unexpired.
- iii. The existing Livestock Market is subject to a number of occupational tenancies and from a review of the tenancy schedule, the individual tenancies expire between 2015 and

March 2016. On this basis Tasley Estates will be able to secure vacant possession of the existing Livestock Market site – albeit it is the intention to relocate the existing occupiers to a new Livestock Market site to the south of the A458. This would prevent any individual tenant frustrating the redevelopment proposals as a new tenancy on the existing site could be opposed on the grounds of redevelopment or indeed the provision of suitable alternative premises.

- iv. As noted above, the proposed scheme will require for a first phase of development comprising of a provision of a replacement Livestock Market as well as significant junction improvements to the junction between the A458 and Wenlock Road.

An assessment of the costs of the provision of a replacement Livestock Market has been undertaken by Robert West Consulting who have assessed the costs to be in the order of £5.1 million. Additionally the costs of the formation of the new roundabout would be in the order of £1 million. With associated works of demolition, servicing provision and professional fees associated with the work then total upfront costs are estimated to be in the order of £7.3 million.

- v. The above costs require to be met from the proceeds of disposal of land released by such works together with the actual value of the proposed new Livestock Market site. It is briefly commented in relation to the various elements of the scheme as follows;

- a. Residential

The scheme provides for 500 new dwellings situated on the boundary of the existing settlement on either side of Church Lane. This will provide an attractive setting and provides the opportunity to create new high value residential properties. The principal existing provisions for new residential development comprising of a new development situated immediately to the south of the subject site being undertaken by Persimmon Homes/Charles Church. The scheme is situated to the east of the A458 and is considered a less attractive location than the proposed new allocations and recent disposals undertaken support sales values of between £205-£225 per sq.ft. on phases such as Kings Court.

- b. Employment Land

The main employment area within Bridgnorth is at Chartwell Park where serviced plots have been available for a number of years with asking prices of around £150,000-£175,000 per acre sought for development plots. It is understood that the remaining plots on the site are under offer with other potential sites such as at the Stanmore Industrial Estate largely completed.

The improvement in the general economy has seen an uplift in demand for industrial sites and premises within Bridgnorth as with many areas and this demand cannot currently be met within the town. The proposed employment area will be accessed directly from the A458 and will benefit from the adjacent replacement Livestock Market and a range of ancillary uses which will be anticipated to relocate from the existing Livestock Market site. It is considered that the shortage of serviced employment sites is likely to result in an increase in the value of employment sites above existing established levels within the town.

- c. Other Proposed Uses

The proposed allocation refers to a number of potential additional uses which includes hotel; recreation space and neighbourhood centre comprising local facilities such as petrol station with a small convenience store, day care and health and fitness facilities.

Subject to an operator being identified, hotel, petrol filling station and day care facilities each produce a good level of site value which will be significantly above

employment land values and in certain circumstances may exceed residential land values. It is considered that many of these facilities are required within Bridgnorth to meet the requirements of both the existing population and the proposed additional population identified within the Local Plan period.

- vi. A series of preliminary development appraisals have been undertaken to support the proposed development scheme and these indicate that the level of development proposed is sufficient to enable the costs of the replacement Livestock Market and significant highways improvements to be funded in addition to other more normal development costs associated with development of the subject scale and uses. Any reduction within the quantum of the allocated development is likely to significantly impact upon the viability of the proposals.
- vii. Expenditure will be front loaded and accordingly the scheme is assessed to carry significant borrowing requirements through a number of phases of development however it is considered that it may be possible to reduce borrowing requirements through the forward sale of some elements of residential development (this is a mechanism used to forward fund a number of major residential schemes) as well as a careful approach to the release of other areas of the scheme.

#### 4. Conclusions

Based upon the above, I confirm that in our view the development proposals which are being created by Tasley Estates Limited and as incorporated within SAMDev 2014 are both viable and deliverable based on our assessment of market conditions as well as a preliminary assessment of project costs undertaken by Robert West Consulting.

It is confirmed that a separate viability assessment report has been undertaken which provides a more detailed analysis of proposed project viability and cashflows and is utilised to support the above statement.

I trust the above is sufficient for your purposes but please do not hesitate to contact the undersigned if additional information is required.

Yours faithfully,

**Chris Thomas BSc. (Hons), MRICS**  
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Enclosure.

