

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Consultation Statement



Contents

| | |
|--|-----------|
| Introduction | 3 |
| Consultation June 2018 | 4 |
| Spring Survey 2019 | 5 |
| Summer Consultation 2019 | 12 |
| Social Media | 14 |
| Appendix One key events timeline | 16 |
| Appendix Two Shropshire Council Informal Comments on the Pre-Regulation 14 Draft May 2020 | 17 |
| Appendix Three 2019 Strategy Paper | 21 |
| Appendix Four Section 14 – Letter to Consultees | 28 |
| Appendix Five Section 14 – Consultees List | 29 |
| Appendix Six Section 14 – Shropshire Council Response | 31 |

Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Broseley Neighbourhood Development Plan (the Plan).

Neighbourhood Plans arose out of the The Localism Act of 2011, which gave new rights and powers to communities. This Neighbourhood Plan is a community led framework for guiding the future development of Broseley. The Plan contains policies for development and addresses a range of social, economic and environmental matters that were brought to the attention of Broseley Town Council through the surveys and consultation that were an essential part of the preparation for the Plan.

In 2017, following a review of its Town Plan, Broseley Town Council resolved to explore the idea of drawing up a Neighbourhood Plan. A steering group was set up, later to be called the 'Broseley Neighbourhood Plan Advisory Group' (NPAG), with town councillors and interested members of the public

Over the next three years the Neighbourhood Plan Advisory Group carried out a number of public consultations, involving public meetings, online surveys, 'street meets', and a final formal balloted survey. The main survey data was collected via a public consultation in the summer of 2018 (paper and online), an online consultation to examine potential development sites (Spring 2019), and a final full consultation of the NP strategy document carried out in June/July 2019 (a copy of the Strategy Paper can be found in Appendix Three).

The results were published in public meetings and on the BTC website. The policies that can be seen in the current Plan evolved during these consultations.

NPAG liaised with Shropshire Council throughout. In May 2020 Shropshire officers provided informal feedback, and several amendments to the wording of policies in Plan resulted from that process. NPAG also provided additional documentation and explanatory notes. The Shropshire Council feedback letter can be found in Appendix Two of this Consultation Paper.

In September 2020 Broseley Town Council initiated the Regulation 14 Pre-Submission Consultation, with a wide range of bodies both statutory and non-statutory. A list of the bodies consulted and covering letter can be found in Appendices Four and Five.

We received relatively few responses to this consultation – the most significant response being from Shropshire Council* regarding the need for strategic assessments. Following this Section 14 feedback Broseley Town Council considered the various options presented and decided to provide the various strategic documentation via the services of our Consultant.

*The Section 14 response from Shropshire Council can be seen in Appendix Six.

Broseley Neighbourhood Plan June 2018 Public Consultation

This was a paper document backed up by an online survey. It was preceded by public meetings to raise awareness of the Plan.

- a) Almost 400 people returned questionnaires, which is around 18% of Broseley's households.
- b) The average age of the respondents was a lot higher than that of Broseley's population as a whole.
- c) An overwhelming 93% of respondents agreed or strongly agreed with the Town Council's aim to preserve the town's existing historic character and scale and to seek to ensure that the community remains at a size that can be sustained by existing services.
- d) Only 7% of people said they were currently looking to move, and only one respondent considered themselves to be homeless.
- e) In response to Shropshire Council's proposal to allocate land for a further 63 houses in Broseley in the next 18 years, 55% of respondents considered this to be about right or too few, and 45% felt it was too many houses.
- f) 59% of those who expressed an opinion agreed or strongly agreed with the idea of allowing small developments of affordable housing for rent to be built outside the present development boundary. 95% of people agreed that priority should be given to local people in the letting of these houses.
- g) 66% of people thought that no more land in Broseley should be allocated for employment use (i.e. commercial or industrial developments).
- h) 88% of those who expressed an opinion thought that the present mix of shops and businesses in Broseley was about right for the town, and 93% of people considered the overall appearance of the town centre was good or very good.
- i) 79% of respondents agreed or strongly agreed that if facilities are at risk, or if it was easier to deliver a service locally, the Town Council should consider running the service or funding the facility, even if this involves additional expenditure.
- j) The most highly-valued green spaces in the town are The Haycop, Birchmeadow Park and the Cricket Field.
- k) The Birchmeadow Park, Birchmeadow Centre, Victoria Hall and the Library are the most popular amenities in the town, all used by over 55% of respondents at least twice a year.
- l) Almost 80% of respondents use the town's health centre and 58% of them agreed or strongly agreed that it offers a reliable and high quality service.
- m) The most important highways and transport issues for people in the town are poor road maintenance, inconsiderate parking, speeding and lack of parking space, all highlighted by at least 60% of respondents.
- n) 98% of those who expressed an opinion were broadly satisfied with the education and childcare provision in Broseley.

Neighbourhood Plan Consultations

Spring Survey 2019 – online via Survey Monkey

This survey asked consultees to look at potential development sites in Broseley

Q1

This asked whether the respondent was a Broseley resident. There were 258 responses of which 3 indicated that they were NOT resident in Broseley.

Q2

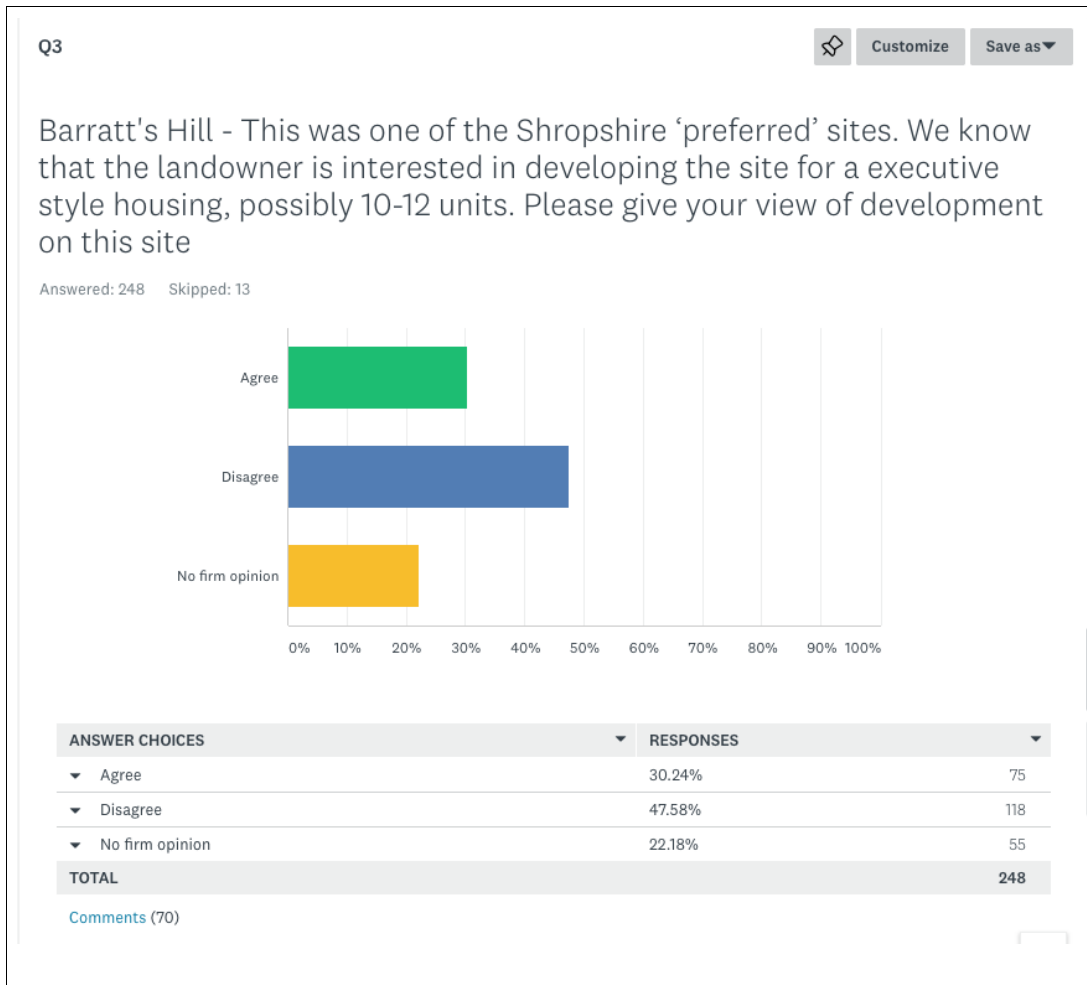


Individual Comments

65 people made additional written comments for this Question. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 12 comments were broadly in support;
- 10 were concerned about access;
- 8 were concerned about the loss of amenity / green space;
- 6 were against.

Q3



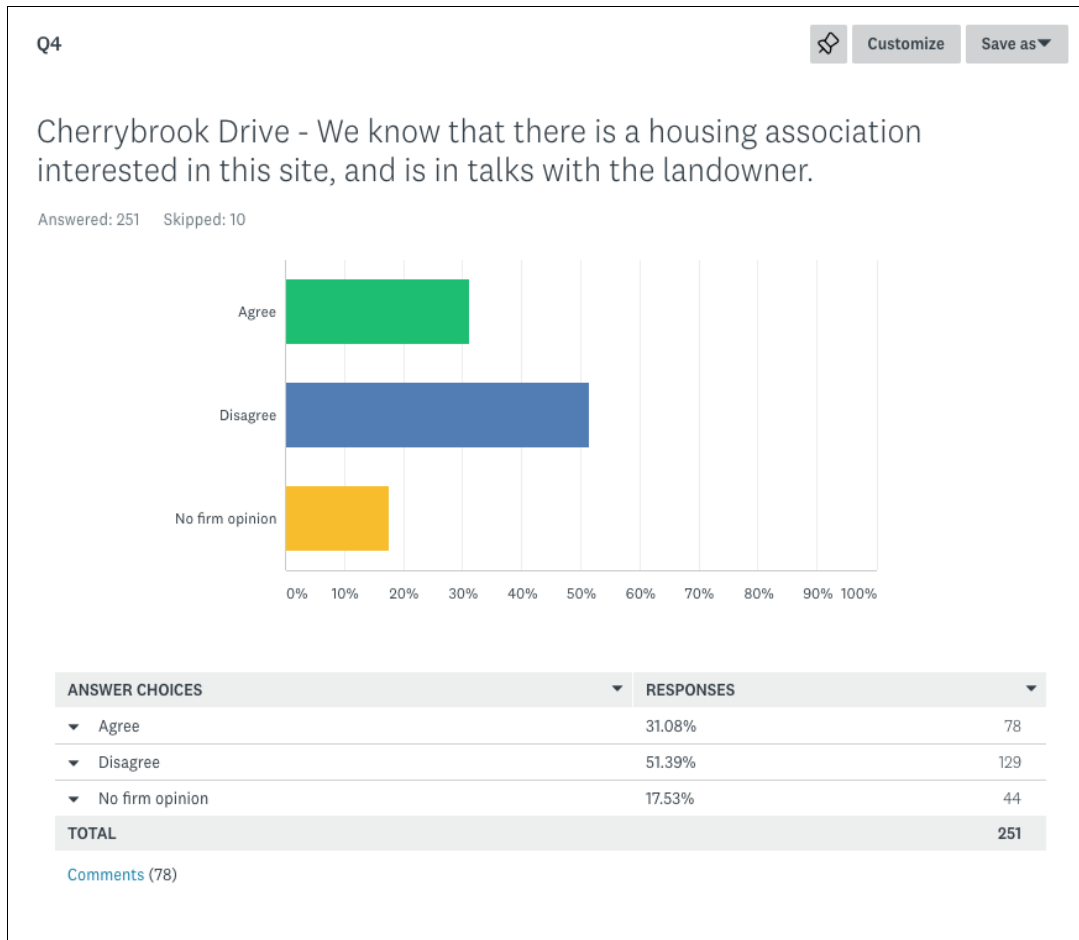
Individual Comments

70 people made additional written comments for this Question. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 23 were concerned about access
- 16 were concerned that the priority should be for affordable/social housing
- 5 were against executive housing on this site
- 5 comments were broadly in support
- 5 were concerned about the loss of amenity / green space

see next page

Q4 – Cherrybrook



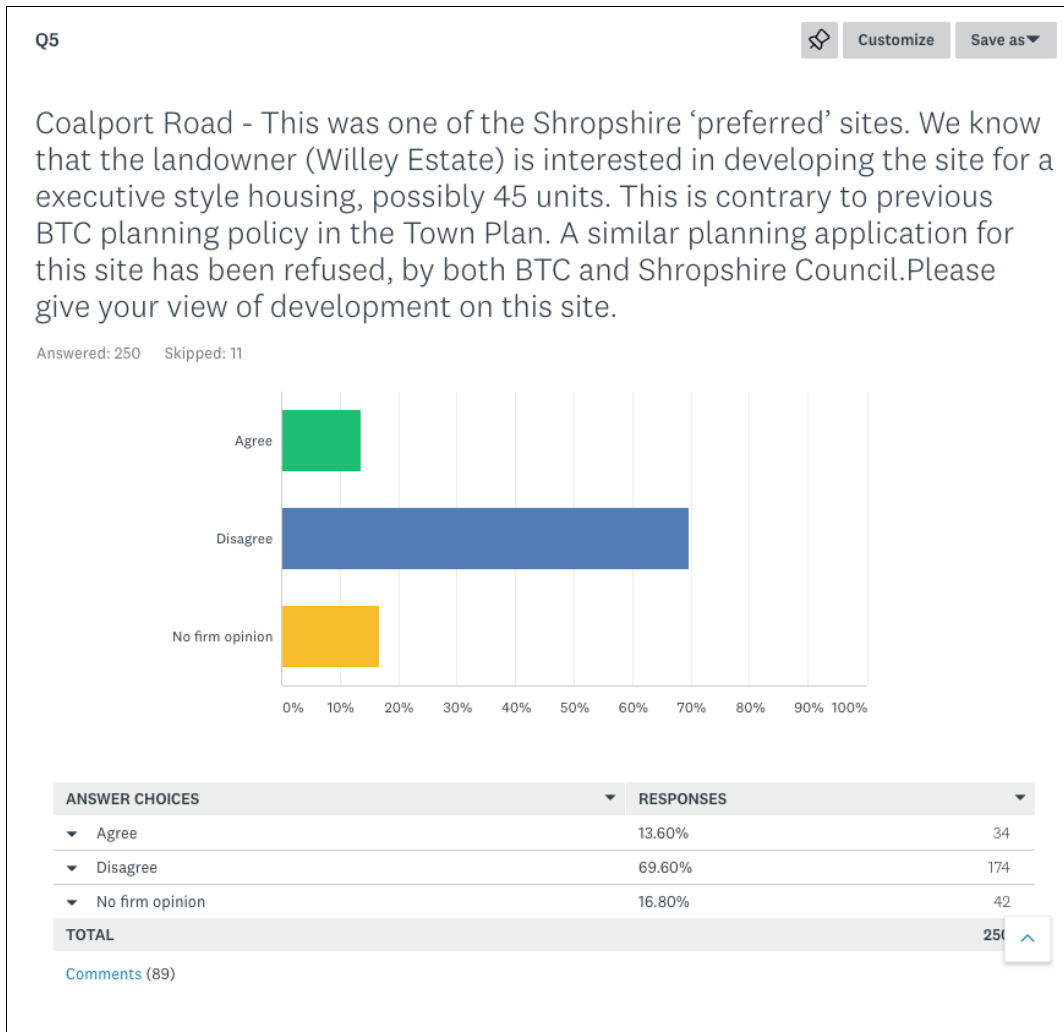
Individual Comments

78 people made additional written comments for this Question. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 27 were concerned about the loss of amenity / green space
- 10 were concerned that the priority should be for affordable/social housing
- 10 were concerned about traffic/access
- 7 were broadly in favour

see next page

Q5 – Coalport Road



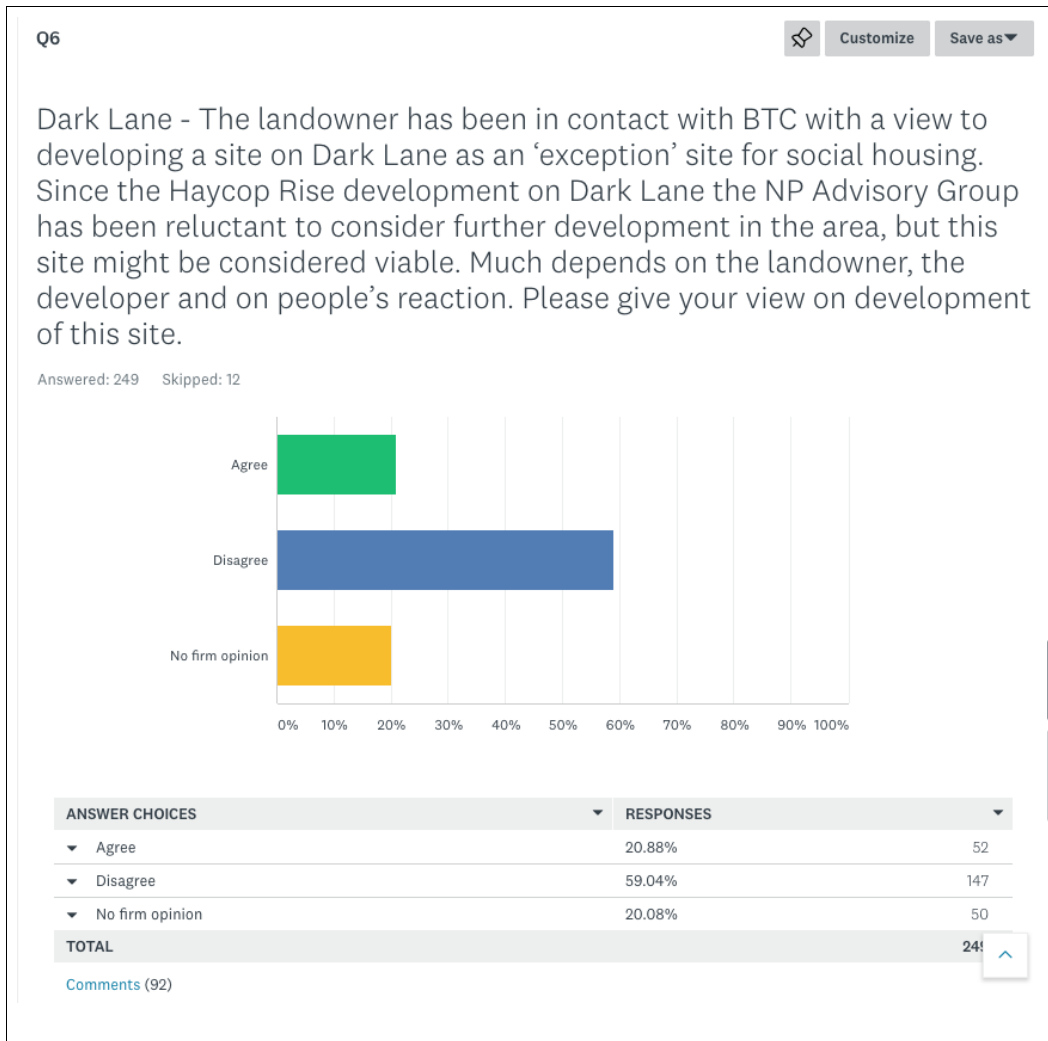
Individual Comments

89 people made additional written comments for this Question. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 28 were concerned about traffic/access
- 11 cited the previous planning refusal for development on this site
- 15 were concerned that the priority should be for affordable/social housing
- 15 were against the development of executive homes
- 8 were concerned that this site was beyond the current development boundary
- 3 were concerned about the loss of amenity / green space
- 3 were broadly in favour of development on this site

see next page

Q6 - Dark Lane



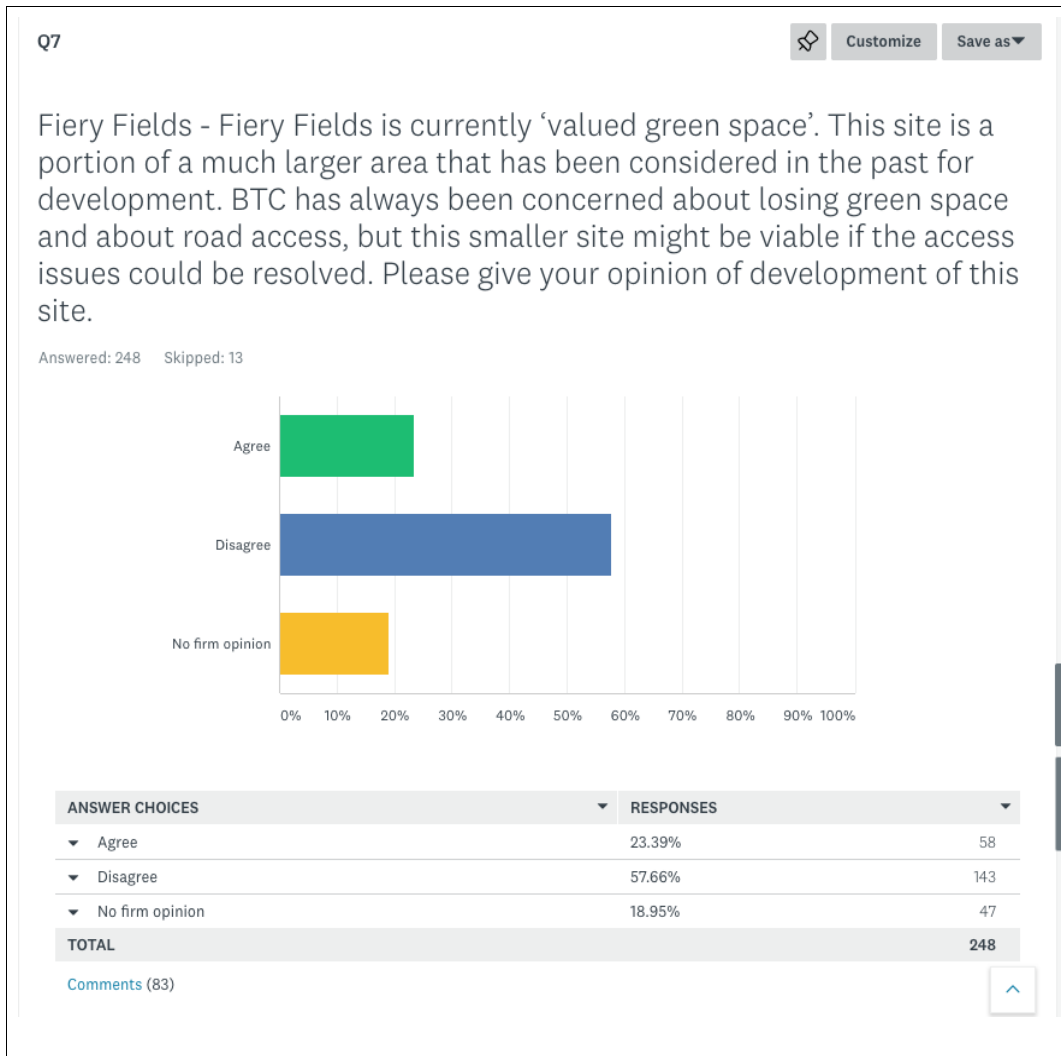
Individual Comments

92 people made additional written comments for this Question. A number were unclear as to the exact location of the site. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 35 were concerned about traffic/access
- 29 felt that there had been too much development in this area
- 15 were concerned that the priority should be for affordable/social housing
- 12 were concerned about the loss of amenity / green space
- 12 were concerned about the proximity to the school
- 6 were broadly in favour of development on this site
- 3 were against social housing on this site

see next page

Q7 Fiery Fields



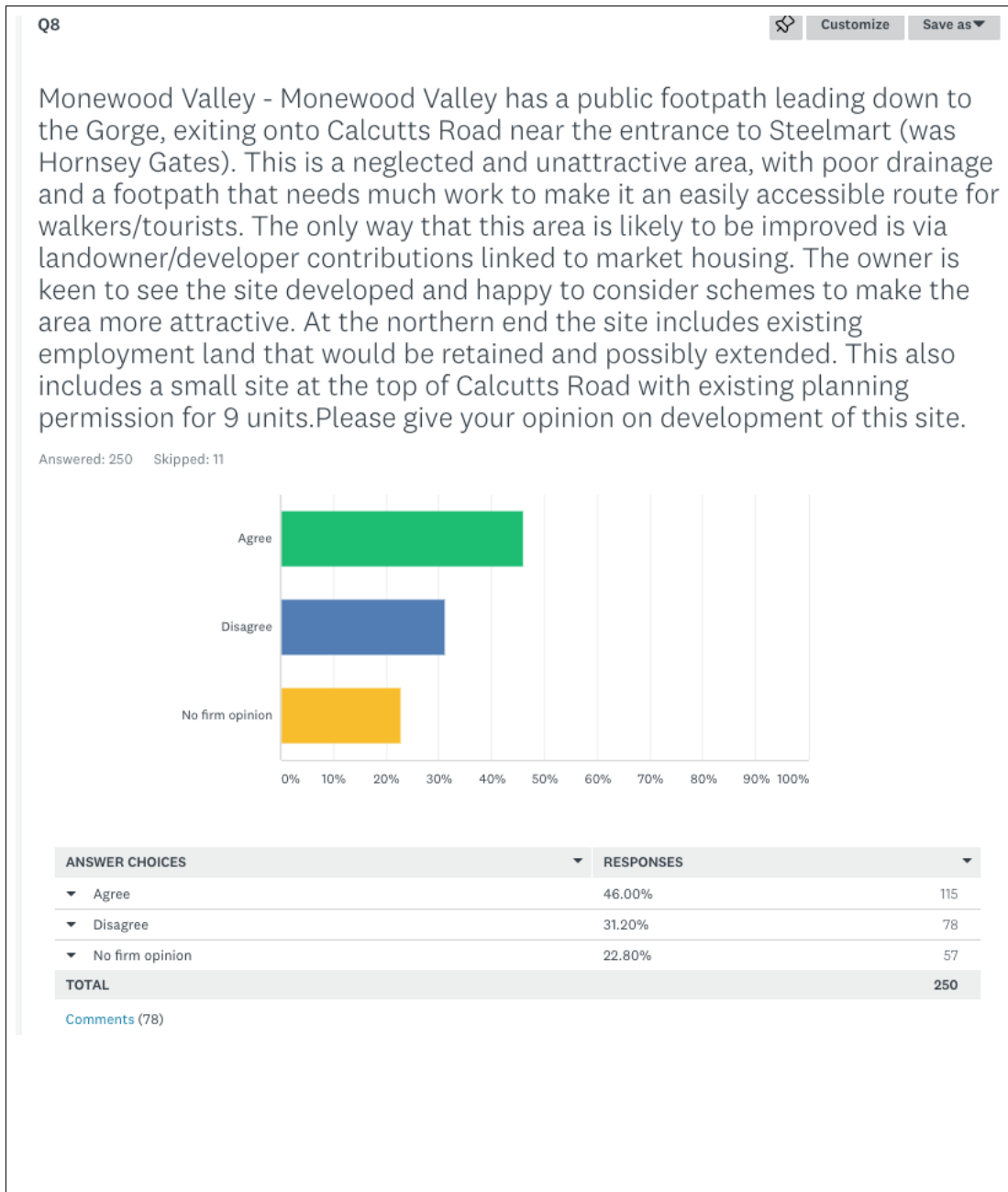
Individual Comments

83 people made additional written comments for this Question. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 35 were concerned about traffic/access
- 29 felt that there had been too much development in this area
- 15 were concerned that the priority should be for affordable/social housing
- 12 were concerned about the loss of amenity / green space
- 12 were concerned about the proximity to the school
- 6 were broadly in favour of development on this site
- 3 were against social housing on this site

see next page

Q 8 Monewood



Individual Comments

78 people made additional written comments for this Question. Some comments were not site specific; some respondents commented on more than one issue. Specific points raised by more than 2 respondents are listed below:

- 43 were broadly in favour of development on this site
- 15 were concerned about the loss of amenity / green space
- 4 were concerned about traffic/access

Broseley Neighbourhood Plan - Summer Consultation 2019

The survey, which closed on September 30th, received 191 responses, with 73 responses having a written additional comment. The main results are set out below.

| | Question | % Agree | % Disagree | % No Opinion |
|----|---|---------|------------|--------------|
| 1 | The Neighbourhood Plan will use the existing Town Plan as a starting point, with much of the detail transferring to the Neighbourhood Plan. | 81 | 8 | 11 |
| 2 | Shropshire Council's Local Plan Review has set a target of 63 new dwellings for the period 2017 to 2036. The NP will ensure that this target is met by a mixture of market and social housing. Developments which increase the provision of new dwellings in this period above 63 will only be supported if they are wholly or mainly social or shared equity housing. | 70 | 24 | 6 |
| 3 | Within the limits set out in Q2 the NP will support reasonably sized schemes of 100% affordable housing as 'exception sites' outside the development boundary for applicants with local | 62 | 31 | 6 |
| 4a | Do you support the development of an 'exception site' on Dark Lane as described in paragraph 5 of the strategy paper? | 58 | 31 | 12 |
| 4b | If local or national targets for new homes in Broseley increase within the NP period of 2020-2036, then consideration may be given to limited scale developments on specific sites identified in the NP. | 60 | 29 | 11 |
| 5 | Shropshire Council has set a target of 3 hectares of employment land for the period 2017 to 2036. The NP will ensure that this target is met via a new allocation of employment land to the SE of Avenue Road, accessed from Bridgnorth Road. A proportion of this site would be allocated as 'mixed use' allowing for some residential development to meet potential future needs. | 65 | 22 | 13 |
| 6 | The NP will set out "Proposed Development Areas' for consideration if national or local development targets are changed over the NP period of 2020-2036. | 65 | 22 | 13 |
| 7 | All the 'valued green spaces' identified in the TP will be protected. Additional green space will be listed as set out on the accompanying maps. | 93 | 4 | 3 |

See next page

Written Responses

These are summarised below. Some respondents commented on different aspects of the Plan.

Detailed Individual Responses;

We received six detailed comments.

One concentrated on the Avenue Road site and the presence of Japanese Knotweed close to the site. One commented on the different definitions of the term affordable housing, on the access difficulties with the Dark Lane exception site – and the possibility of considering 'Live / Work' options for developments.

Three wrote in detail opposing the site on Dark Lane, with one questioning why the NP group had not taken previous opposition into account.

One discussed the entire Plan, making useful comments about drafting and detail.

Brief individual comments

Thirteen respondents made brief individual comments. These ranged from one line comments about the process, to comments about individual aspects of the Plan, to concerns about the necessity for any development in Broseley. Some comments asked the NP to consider the need for single story accommodation for older people.

Transport and traffic

Twelve respondents made comments about transport and traffic issues. Several focused on the need for an effective bus service, several focused on parking, on perceived congestion and the poor quality of the road infrastructure. Some of the latter comments were about the state of the roads rather than the infrastructure itself. One comment called for more controls on HGVs.

Impact of development on services

Thirteen respondents made comments about the impact of development on services in the town, mainly focusing on the pressures faced by schools and the health centre. Others linked the issue to roads, transport and crime.

Dark Lane

Six respondents (plus three above) made comments about the proposed Dark Lane development. Some questioned the need for any further development, others questioned why more suitable sites could not be found, a number cited the traffic problems experienced by residents at school opening and closing times, some cited the loss of green space.

'Exception' sites policy

Ten respondents made comments about the suggested 'exception' sites policy. With some questioning the demand for such housing, others questioning the locations. A number referred specifically to the site off Woodlands Close. The precise nature of any policy for local preference was also mentioned.

Valued green space

Six respondents made comments about 'valued green space', with some raising issues about land ownership, one asking how Penns Meadow might be protected, one asked for more traffic friendly routes, including routes for bikes, others emphasising the view that VGS should be protected.

Employment areas

Two respondents wrote specifically about employment areas with both saying that existing areas should be fully utilised before additional areas were allocated. A number of the respondents who commented on other issues made similar points.
















In Support

Five respondents made general comments in support of the Plan.



















Social Media

The Neighbourhood Plan Advisory Group made full use of Social Media to arise awareness of the Plan. NPAG set up a dedicated Facebook Page, and monitored other pages to improve of awareness of the issues concerning residents. Screenshots of the reporting option for the NPAG facebook page give an indication of the level of involvement.

Facebook page report for May 2019

| All posts published | | | | | | | |
|---|---|---|---|--|--|----------------------------|--|
| ■ Reach: Organic/Paid ■ Post clicks ■ Reactions, comments & shares ? | | | | | | | |
| Published | Post | Type | Targeting | Reach ? | Engagement | Promote | |
| 12/05/2019 17:38 |  |  |  | 127 ■ | 11 2 ■ | Boost Post | |
| 09/05/2019 09:21 |  Broseley's Neighbourhood Plan Team has considered the |  |  | 314 ■ | 33 11 ■ | Boost Post | |
| 15/04/2019 10:39 |  |  |  | 1.9K ■ | 54 32 ■ | Boost Post | |
| 09/04/2019 19:16 |  We are aware of the land clearance off Cherrybrook Drive. Anyone with |  |  | 164 ■ | 12 0 ■ | Boost Post | |
| 24/03/2019 09:11 |  Do you run a local business? Do you know someone who does? |  |  | 937 ■ | 41 8 ■ | Boost Post | |
| See more | | | | | | | |

Facebook page report for June 2019

| All posts published | | | | | | | |
|---|---|---|---|--|---|----------------------------|--|
| ■ Reach: Organic/Paid ■ Post clicks ■ Reactions, comments & shares ? | | | | | | | |
| Published | Post | Type | Targeting | Reach ? | Engagement | Promote | |
| 30/06/2019 10:31 |  Display in the library now , pop in and have a look ,please give your |  |  | 1.3K ■ | 174 29 ■ | Boost Post | |
| 30/06/2019 09:02 |  Over the next few days every household in Broseley will be |  |  | 2.1K ■ | 411 32 ■ | Boost Post | |
| 12/05/2019 17:38 |  |  |  | 147 ■ | 11 2 ■ | Boost Post | |
| 09/05/2019 09:21 |  Broseley's Neighbourhood Plan Team has considered the |  |  | 333 ■ | 33 11 ■ | Boost Post | |
| 15/04/2019 10:39 |  |  |  | 2K ■ | 54 32 ■ | Boost Post | |
| 09/04/2019 19:16 |  We are aware of the land clearance off Cherrybrook Drive. Anyone with |  |  | 175 ■ | 12 0 ■ | Boost Post | |
| See more | | | | | | | |

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

Facebook Page reports for posts between February 2020 and February 2021

| Published | Post | Type | Targeting | Reach | Engagement |
|---------------------|--|---|---|--|---|
| 08/02/2021 09:28 |  Please note that posts relating to the Neighbourhood Plan will in |  |  | 101  | 2 0  |
| 14/12/2020 17:21 |  December update: Shropshire Council has raised some technical |  |  | 638  | 21 5  |
| 15/07/2020 11:57 |  On June 9th Broseley Town Council approved the latest version of the |  |  | 379  | 9 1  |
| 31/03/2020 13:27 |  I'm sure that you have all already worked this out but the NP |  |  | 214  | 1 1  |
| 03/03/2020 20:44 |  The draft Neighbourhood Development Plan has been placed |  |  | 1.2K  | 89 13  |
| 20/02/2020 17:22 |  Thanks to those who attended last night's Neighbourhood Plan |  |  | 393  | 15 10  |
| 17/02/2020 20:28 |  Public Meeting to discuss Broseley's Neighbourhood Plan |  |  | 2.9K  | 87 36  |
| 12/02/2020 10:35 |  Public Meeting to discuss Broseley's Neighbourhood Plan |  |  | 1.9K  | 198 21  |
| 03/02/2020 16:33 |  Public Meeting to discuss Broseley's Neighbourhood Plan |  |  | 2.7K  | 71 44  |

Appendix One

Broseley Neighbourhood Plan - Consultation timeline of key events

| | |
|------------------|---|
| 26/01/18 | First public meeting held to launch the ‘Broseley and Benthall Neighbourhood Plan’. |
| 01/06/18 | First public consultation takes place, with a questionnaire delivered to every household in Broseley, plus an on-line version of the poll. |
| 01/07/18 | Two public meetings are held to present the results of the consultation. Task groups are set up to explore aspects of the proposed NP in more detail. |
| 22/09/18 | Public meeting held on the subject of Heritage and Environment. |
| 27/10/18 | Public meeting held on subject of Public and Voluntary Services. |
| 01/12/18 | Consultation with local businesses is launched. |
| 29/01/19 | Public meeting held on housing and other development. Second public consultation (paper and on line) on specific development sites is launched |
| 01/03/19 | Programme of meetings with landowners commences. |
| 15/05/19 | Public meeting held to provide update on all aspects of NP and announce plans for next public consultation. |
| July-August 2019 | Third public consultation takes place, with briefing document and questionnaire delivered to every household in Broseley. |
| 01/09/19 | Results of third public questionnaire published. |
| 01/01/20 | NP Display with maps and executive summary in Broseley Library. |
| 19/02/20 | Public Meeting to present draft NP. |
| 01/09/20 | BTC begins Section 14 consultation |
| 12/04/21 | BTC begins section 15 consultation with Shropshire Council |

Appendix Three

Shropshire Council Informal Comments on the: Pre-Regulation 14 Draft of the Broseley Neighbourhood Plan May 2020

Thank you for providing Shropshire Council with the opportunity to informally comment on the pre-Regulation 14 Consultation draft of the Broseley Neighbourhood Plan (BrNP). At this stage our comments focus on whether the BrNP meets the 'scope of Neighbourhood Development Plan (NDP) provisions', as such we consider whether the draft Neighbourhood Plan meets the Basic Conditions as set out in the Act. In summary these are:

1. Compliance with national policies, guidance and advice;
2. Contribution to the achievement of sustainable development;
3. Conformity with the strategic policies contained in the development plan for the area; and
4. Compatibility with EU obligations.

These are also the four tests against which the Independent Examiner will assess the Neighbourhood Plan. We will of course provide more general comments on the plan during the Regulation 14 Consultation.

Compliance with national policy, guidance and advice

Based on an initial review of the draft BrNP, it is considered that it has been prepared in line with national policy and guidance and meets the necessary criteria and expectations of a neighbourhood plan as set out in the NPPF and NPPG. However, there are some minor queries which are explored below relating to affordable housing.

A more comprehensive review and commentary on this matter will be provided during the Regulation 14 Consultation.

Contribution to Sustainable Development

Based on an initial review of the draft BrNP, it is considered that achieving sustainable development is at the heart of the document. The BrNP seeks to achieve this aspiration in conjunction with responding to climate change through use of energy efficiency, design and sustainable construction policies. Additionally, the BrNP seeks to make best use of passive solar gain through siting and orientation of development, use of thermally efficient building materials, installation of energy efficiency measures and use of on-site renewable energy sources, such as solar panels.

We would however note that ultimately this will be linked to the compatibility with EU Regulations, which we address later in this response.

A more comprehensive review and commentary on this matter will be provided during the Regulation 14 Consultation.

General conformity with Development Plan strategic policies

The emerging Plan will cover the period from 2016 to 2038, as such the BrNP will need to reflect this time period.

Generally the emerging policies within the draft BrNP are in conformity with current and the

direction of emerging Local Plan policies. However, based on an initial review there are a limited number of the policies within the BrNP which may need minor alteration to ensure that they are consistent with both national and local policies. Specifically:

- a) Policy HO6 (affordable housing) must conform with both local and national policy relating to affordable housing;
- b) Policy EJ2 would need to demonstrate that it is achievable, ultimately there will be HGV movement through residential areas to some degree | this policy should therefore seek to minimise these occurrences rather than represent a blanket ban. Suggested text can be found in Appendix 1; and
- c) GR1 would need to ensure that it has sufficient evidence to demonstrate that each area identified can be considered as Valued Green Space.

Additionally, whilst a number of maps are provided in the appendices within the BrNP, a Proposals Map is required which consolidates all of the allocations proposed, as well as additional key aspects such as valued green space, the development boundary, existing allocations and international, national and appropriate local designations. This proposals map will need to illustrate the current SAMDev employment allocation which will be saved within the Local Plan Review.

In terms of residential developments, Broseley has achieved some 128 completions between 2016/17 and 2018/19, and has commitments of some 72 dwellings as at 31st March 2019. The net requirement is therefore some 50 dwellings. We are also aware of further windfall consents since 21st March 2019, these in combination with the proposed allocation and further windfall opportunities provide confidence that the residential guideline can be achieved. It will be important to ensure that robust evidence is available to justify proposed residential site allocations.

Employment in Broseley consists of 1ha committed as at 31st March 2017 and known further windfall consents. This combined with the proposed allocation and further windfall opportunities provide confidence that the employment guideline can be achieved. It will be important to ensure that robust evidence is available to justify proposed employment site allocations.

As explained above, at this stage we have not undertaken a detailed review of the policies and site allocations within the draft BrNP, however in reviewing the document to prepare this response we did note a couple of issues which may benefit from minor amendments, these are documented within the table at the end of the document. A more comprehensive review and commentary on this matter will be provided during the Regulation 14 Consultation.

Compatible with EU Regulations

As the statutory body, Shropshire Council is responsible for undertaking SEA and HRA screening of the BrNP. However, until such time as we have a full understanding of the proposals within the draft BrNP these screening exercises cannot be undertaken. As such we are not intending to comment on this matter extensively at this time.

Rather, our intention is to prepare and provide SEA and HRA screening responses, in consultation with relevant bodies, following the Regulation 14 consultation. As such comments at this stage and within our response to the Regulation 14 consultation feedback are and will be subject to the results of subsequent SEA and HRA screening.

At this stage we would simply acknowledge that the BrNP steering group has sought to ensure that consideration of the environmental implications of proposals is undertaken at the earliest stages of and throughout the process of preparing the BrNP. We would encourage you to document how this has been achieved in the plan making process in order to ensure that a robust evidence base is available. This is particularly important to support proposed policies and proposed site allocations.

Conclusion

Based on an initial review, it is considered that the BrNP is broadly compliant with national policy, guidance and advice (subject to the comments provided); will contribute to sustainable development (subject to conclusions reached within the SEA and HRA screening); and is broadly compliant with the current and emerging Local Plan Review (this is somewhat dependent on the suggested amendments made above as well as in Appendix 1 below, in particular the conformity around the affordable housing policy).

Appendix 1 - Comments on and suggested detailed wording amendments to BrNP text and policies

Policy/page no.

Suggested amendment

2038

Comment

Pg 22 – 8.1 Strategic Policies

Amend as follows:

“...The overall strategic approach for new housing is to focus development on Shrewsbury, **Principal and Key Centres**, and Community Hubs and Clusters.”

The emerging Plan has an urban-focussed approach, whereby Shrewsbury and the other main settlements are subject to the most development.

Community Hubs and Community Clusters will be the focus for development within the rural area.

Pg 22 – 8.2 Strategic Policies

Amend as follows:

“Taking into account recent planning permissions, dwellings completed and under construction the target for Broseley is for 50 new homes over the Plan period up to 2026 ”.

The emerging Local Plan runs until 2038

Design Principals (pg6-7 – Policy HO1)

Amend as follows:

“Development should not: a) adversely affect **promote** local landscape character and visual amenity; b) adversely affect **promote** the heritage assets of Broseley or their setting.”

To avoid use of negative wording

Design Principals (pg7 – Policy HO5)

Amend as follows:

“Proposals for single plot exemption sites on areas **not identified as** valued green space as defined in Policies

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

GR1 and GR2 will not be supported”

To avoid use of negative wording

Economy and Jobs (pg8 – Policy EJ1)

Amend as follows:

“...a) The scale and nature of the proposed development would not have a significant harmful **positive** effect on the amenity of neighbouring residential areas; b) The proposal would not have unacceptable impacts on the local road network;

To avoid use of negative wording

c) The proposal provides adequate access, including walking, cycling, public transport and parking; d) The proposal has access to appropriate infrastructure; e) The proposal does not have **has** a significant adverse **positive** impact on adjacent land uses;

f) The proposal does not adversely affect **promotes** the character of the area; g) Proposals to change existing employment land to alternative uses will only be supported where it can be demonstrated that the site is no longer viable through an active marketing exercise in which the property has been offered for sale or rent on the open market at a reasonable price and no reasonable offers have been refused.”

Economy and Jobs
(pg8 – Policy EJ2)

Amend as follows: “Access to any such development should not involve **aim to minimise** HGV movements through existing residential areas.”

Needs rewording as inevitably there may be some HGV movement in residential areas, however such movements should not be promoted and should be minimised as much as practicable.

Conservation,
Heritage, Landscape
and the
Environment (pg10 –
Policy CH2)

Amend as follows: “New development **will be supported where there is a positive** that would have an adverse and harmful impact on the quality and visual appearance of the open countryside around Broseley will not be supported.”

To avoid use of negative wording

Community
Resources (pg10 –
Policy CR1)

Amend as follows: “Proposals **will be supported where** that would result in there is a the loss of community resources and facilities in Broseley will not be supported unless **provided that:...**”

To avoid use of negative wording

Appendix Three

Neighbourhood Plan Summer 2019 Consultation – Strategy Paper



Broseley Neighbourhood Plan Strategy Paper



A Neighbourhood Plan sets out where new homes, shops and offices might be built, and allows a community a say on what those new buildings should look like and what infrastructure should be provided.

This strategy paper has been produced by the Neighbourhood Plan Advisory Group, a group of local volunteers who have been working on the proposals since November 2017.

Our vision is for a Broseley that is economically viable, a safe place to live, and one that supports a vibrant community in which every resident can play a part.

We want to work with residents and businesses to preserve the town's heritage and character, whilst embracing the development needs, opportunities and challenges of the 21st century.

To enable that vision the Neighbourhood Plan (NP) will be guided by the following:

1 The NP will use the existing Town Plan (TP) as a starting point.

This has been the consistent policy of the NP Advisory Group since its formation and this policy has been supported by consultation responses over the consultation period.*

*The Town Plan can be found on the Town Council website.

2 Much of the existing policy detail will readily transfer from the TP to the NP.

The NP will clearly identify policy differences between the TP and NP.

3 The provision of additional low cost housing is a high priority for the NP. The NP will support reasonably sized schemes of 100% affordable housing as 'exception sites' outside the development boundary for applicants with local connections.

a) A priority for affordable housing has been the consistent policy of the NP Advisory

Group since its formation and this policy has been consistently supported by consultation responses over the consultation period.

b) “Exception sites” have specific legal conditions attached to their use. An exception site is a parcel of land where the homes built are reserved solely for local people, in perpetuity, usually as rented housing provided by a recognised housing association.

c) 'Affordable' can have different meanings in different contexts. In the NP 'affordable' on exception sites will mean housing for rent as defined above, provided by a recognised housing association.

4 Shropshire Council’s Local Plan Review has set a target of 63 new dwellings for the period 2017 to 2036. The NP will ensure that this target is met by a mixture of market and social housing. Developments which increase the provision of new dwellings in this period above 63 will only be supported if they are wholly or mainly social or shared equity housing.

- ⊖ The Plan will recognise Shropshire Council’s current target for 63 new dwellings to be created in Broseley in the period from March 2017 until March 2036. However, since March 2017, up to April 2019, approval has been given to the creation of 23 additional dwellings. Therefore the view of the advisory group is that the required target should be for 40 dwellings.
- ⊖ Shared equity housing works by providing the buyer, usually a first time buyer, with a loan which will form part of the deposit for the property. A shared equity mortgage is then taken out on the remaining part of the property's value.

5 New developments of market housing will only be supported inside the development boundary within the limits set out in the the NP strategy document and accompanying notes.



The remaining approximately 40 dwellings required to meet the current target will be delivered by infill developments of market housing within the development boundary and by small-scale developments of 100% affordable housing on exception sites adjacent to the existing development boundary.

This may include the site on Dark Lane currently under consideration (see left and main map). If approved this site would be an exception site under the definition in paragraph 3b, with a maximum of 24 dwellings.

These houses will be retained for occupation by people with a strong local connection in perpetuity and the definition of 'local connection' will be included in the Plan.

Both landowner and developer are aware of the existence of mine workings in one corner of the site. It is assumed that the area would be open space. The fields to the south of this site will be designated as ‘valued green space’ to emphasise the intention that development does not spread back towards the High Street.

6 If Shropshire's target for new homes in Broseley increases within the NP period of 2020-2036, then consideration may be given to limited scale developments on specific sites identified in the NP.

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

The NP will identify land for consideration* should the national or local development targets be adjusted, or in the case of a significant change in circumstances in an area covered by the Plan. Any such development would only be supported if it met the requirements set out in paragraph 4 and notes. Due to the severe constraints in the road network, no new development will be supported in the following areas:

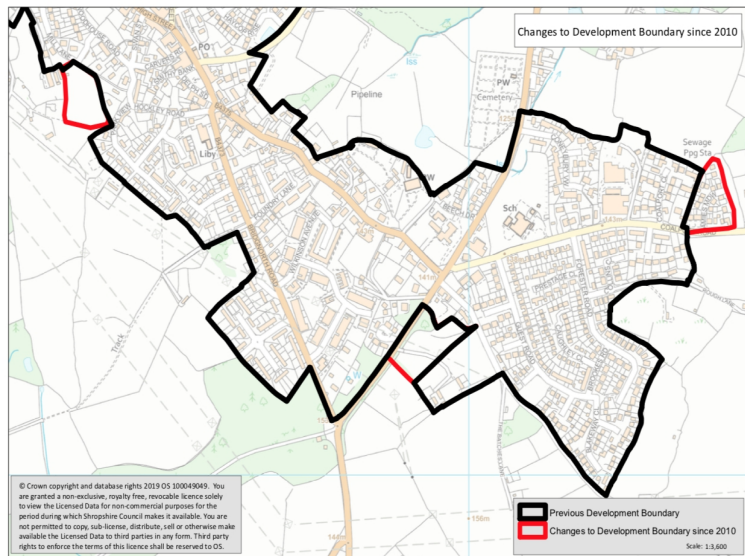
- a) North of the junction of King Street and Woodlands Road, including: Balls Lane, Cobwell Road, Maypole Road Sycamore Road Woodlands Close and Woodlands Road.
- b) South or East of Park View.

*see 'Proposed Development Areas – Future' as shown on main map. These areas might also be considered for employment or mixed use.

7 The development boundary for Broseley will be changed where required to encompass existing or approved development (see insert right and main map – centre pages).

a) Changes will be needed to encompass developments that have been built (such as Amies Meadow off Coalport Road), and proposed developments that have been granted planning permission (such as the site adjacent to Park View and Mill Lane).

b) No further development of market housing will be supported outside the development boundary unless and until Shropshire Council's policies impose an increased target for new dwellings in Broseley. Even in that case we would expect new developments to take place on the specific sites identified (see paragraphs 4 & 6 and notes).



A larger version of this map can be seen at the library

8 Existing employment sites will be supported; change of use will only be supported where it can be proven that retention for employment use is impossible, or where another viable site has been identified.

9 The NP anticipates future employment growth arising from small scale start up businesses, retail, and tourism focused businesses.

This policy view arises from our consultations with business and from the fact that medium to large scale businesses are very well catered for on the various industrial estates in Telford.

10 Shropshire Council's Local Plan Review has set a target of 3 hectares (ha) of employment land for the period 2017 to 2036. The NP will ensure that this target is met via a new allocation of approximately 3ha of employment land to the SE of Avenue Road, accessed from Bridgnorth Road.

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

The landowner is not in favour of employment development on the site currently designated for employment use off Pound Lane (marked in yellow within area 'D' on the map below). This site is also affected by the planning permission for housing on part of the site (granted after appeal in 2016).

The NP will propose a different site in the same area (A+B), accessed from Bridgnorth Road south of the B4373 junction.

Mixed development in area 'B' in the medium or long term (see point 6) could include offices, workshops, storage or distribution premises, with a small-scale development (maximum 20) of housing – with commercial access from Bridgnorth Road at the B4373 junction with the existing HGV route.



Key:

- - - = Access route

Area A = possible employment land allocation.

Area B = is a segment that will almost certainly fall within the development boundary. It might be classed as employment land, or as housing - with an appropriate buffer zone. Our preference for this land would be as a 'reserve' plot, that might be brought into use in the future when new targets from government appear.

Area D = plot with existing outline planning permission.

11 All the 'valued green spaces' identified in the existing TP will be protected. Consideration will be given to listing additional green space*.

| Existing "Valued Green Space" as designated in the Broseley Town Plan | | Proposed Valued Green Space to be designated in the Neighbourhood Plan | |
|---|--------------------------|--|------|
| GS1 | Land north of Balls Lane | Strip of land to the east of Cherrybrook Drive | GS5a |
| GS2 | Woodlands Green | A green space corridor from Ironbridge Road north, through Monewood to the Gorge | GS6 |

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

| | | | |
|------|--|--|------|
| GS3 | Land surrounding the Fish House extending down to Ironbridge Road | Fields to the east of Dark Lane | GS8 |
| GS4 | Cricket Club Fields | Extending the upper reach of the Corbetts Dingle green space area to include a strip of woodland just beyond the turn off to Coneybury Farm | GS10 |
| GS5 | Stocking Mound & Barnetts Leasowe Mound | A corridor between the Sewage plant and Jackfield Tile Museum and encompassing The Wilds, Preens Head and the areas of the Jackfield stabilisation project that fall within the Broseley boundary.** | GS15 |
| GS7 | Birchmeadow Fields | | |
| GS9 | The Haycop | | |
| GS11 | Corbetts Dingle | | |
| GS12 | land between Dark Lane, Ironbridge Road, the Haycop and the church | | |
| GS13 | Fieri Fields | | |
| GS14 | play space off Pound Lane | | |

* Penns Meadow has been removed from this list because it is not within the Broseley boundary.

** This area, much of which falls within the World Heritage Site, is not shown on the accompanying maps.

12 The NP will examine the current green infrastructure (footpaths, bridleways, green space) and work to identify infrastructure improvements that would both protect the green infrastructure and develop the tourist economy.

a) The NP will identify 'green routes', protecting footpath links between Broseley and the World Heritage Site. Possible green routes might include:

i) From Dark Lane through the Haycop and Monewood Valley

ii) From Ironbridge Road through Corbetts Dingle to Jackfield

iii) From the Ironbridge Road / Church Street junction, following Pound Lane and Caughley Road past Inett and Swinney Farm to the disused railway line.

b) New developments in Broseley will, where possible, create new footpath links.

c) The NP will identify potential 'permissive' paths that could, with the co-operation of landowners, create an improved footpath network. Possible permissive paths might include a path to the east of the Tileries linking Coalport Road, Pound Lane and Rough Lane.

13 The NP group will identify infrastructure requirements that follow from the developments outlined in the Plan. These will include:

a) Improvements to the primary schools serving the Town

b) Improvements to infrastructure supporting the tourist economy

- c) Improvements to walking and cycling routes to support the tourist economy and to promote healthier lifestyles
- d) Improvements to strengthen measures to keep HGVs out of the Town Centre and residential areas.

Community Resources

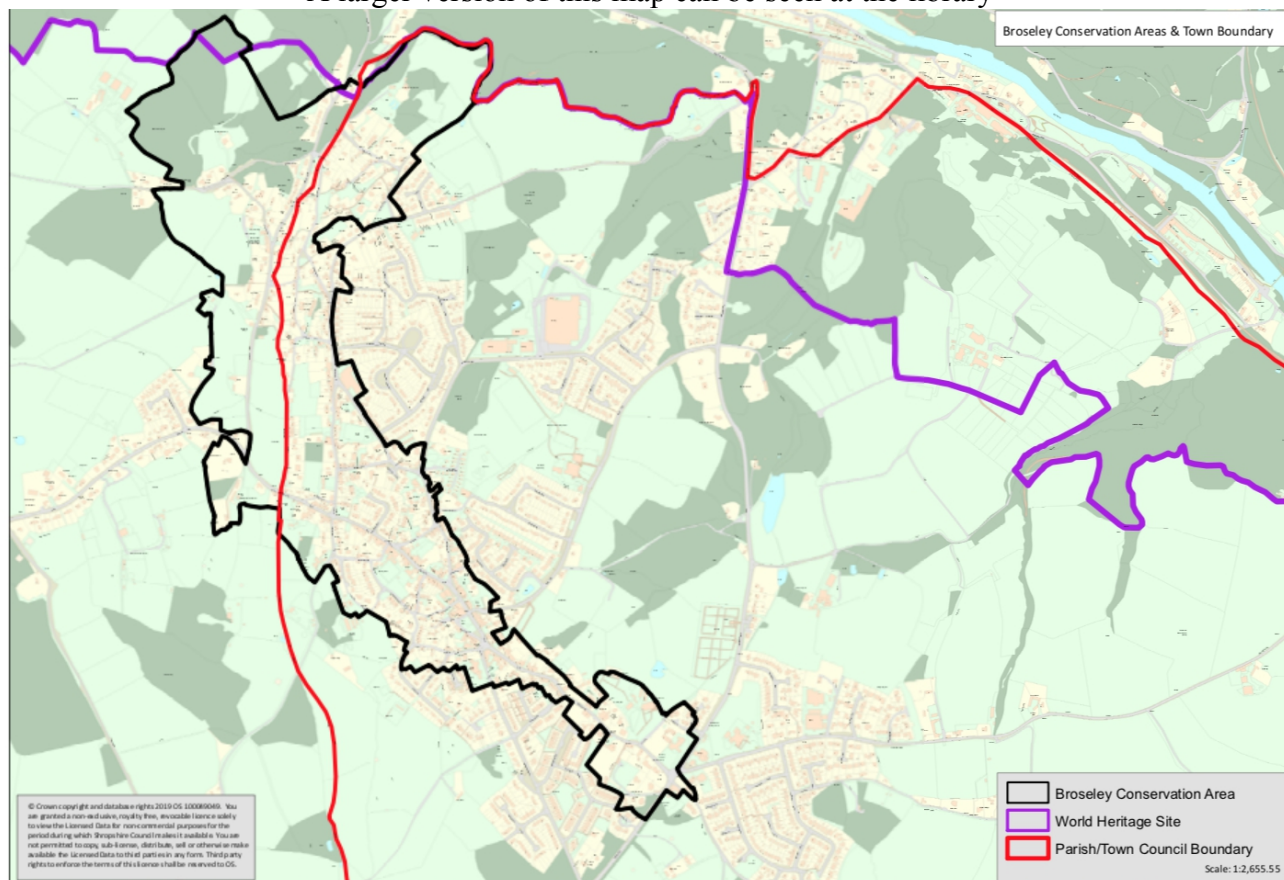
15 Strong community resources are an invaluable part of Broseley's character and the NP will recognise this and seek to work with the TC to identify means to support those resources.

Conservation Areas

Broseley has two conservation areas (shown on the final page of this document). One is part of the World Heritage Site that falls within the Broseley Boundary. The other is Broseley's own Conservation Area, covering the High Street, the Jitties and much of Broseley Wood. Part of this area extends into Benthall, and is therefore the responsibility of Barrow Parish Council.

16 The Neighbourhood Plan will propose no changes to either Conservation Area; Conservation and Heritage will be strongly supported.

A larger version of this map can be seen at the library



Next Steps

A successful Plan would be a legal Planning document; setting out the development needs for the area, and offering real planning protection against unwanted and unsuitable development in our neighbourhood.

If there is public support for these policies and recommendations then we will engage a consultant to put those policies and ideas into 'planning language'. We then have to submit the draft document to Shropshire Council. If the draft Plan passes through those tests it is put to a public referendum in Broseley, and only if the referendum vote is in favour will the Plan be adopted by Shropshire and take legal force. We hope the process might be complete sometime in 2020.

If the NP is **not** supported, there is no second chance or plan B. Potential development land in the Town would face the same pressures as land in our neighbouring communities.

Please give your view about these proposals on the accompanying question sheet.

We welcome longer and more detailed responses by letter or e-mail – please send additional comments to the Town Council Broseley Town Council Office:

**The Library Building
Bridgnorth Road
Broseley
Shropshire
TF12 5EL**

If you wish to make a direct comment to the Neighbourhood Plan team, then please do so by e-mail to: BroseleyNP@gmail.com

Appendix Four – Section 14 Consultation

Letter to Consultees



Broseley Town Council

The Library Building, Bridgnorth Road, Broseley, Shropshire TF12 5EL

14 September 2020

Broseley Neighbourhood Plan Statutory Consultation

Dear Sir / Madam

Please find attached the draft Neighbourhood Plan for Broseley.

We are enclosing the main draft document, a policies map and an executive summary. These documents are in PDF format. You are being sent these documents as part of a statutory consultation as required by Schedule 1 of the Neighbourhood Plan Regulations. You may request these documents in writing by contacting the Town Council at the above address.

The consultation will close on Tuesday 3rd November 2020, after which responses will be considered and, if necessary, acted upon, before the Neighbourhood Plan is assessed by a HMG independent examiner.

Please return consultation responses by the due date to the above address by email or post, clearly marking your replies – 'Broseley Neighbourhood Plan Section 14 Consultation Response'.

Yours sincerely

Sharon Clayton MPA, BA (Hons) Fellow SLCC
Locum Town Clerk

Appendix Five – Section 14 Consultation

Consultees List

Section 14 - Bodies to consult

With regard to relevant organisations for consultation, Schedule 1 of the Neighbourhood Plan Regulations states:

“1. For the purposes of regulations 14 and 16, a “consultation body” means—

- (a) where the local planning authority is a London borough council, the Mayor of London;
- (b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;

include: SC, T&W, Ironbridge PC, Barrow PC, Much Wenlock TC

- (c) the Coal Authority(1);
- (d) the Homes and Communities Agency(2);
- (e) Natural England(3);
- (f) the Environment Agency(4);
- (g) the Historic Buildings and Monuments Commission for England (known as English Heritage)(5);
- (h) Network Rail Infrastructure Limited (company number 2904587);
- (i) the Highways Agency;
- (k) any person—
 - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and
 - (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority;

i.e. phone mast companies, BT, Open Reach

- (l) where it exercises functions in any part of the neighbourhood area—
 - (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(7) or continued in existence by virtue of that section;
 - (ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(8);

include: Western Power Distribution

- (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(9);
- (iv) a sewerage undertaker; and
- (v) a water undertaker;

Severn Trent

- (m) voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

- (n)bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;
- (o)bodies which represent the interests of different religious groups in the neighbourhood area;
- (p)bodies which represent the interests of persons carrying on business in the neighbourhood area; and
- (q)bodies which represent the interests of disabled persons in the neighbourhood area”.

Plus - we put two bound copies in the library, alongside the library display, and we put the Policies Map, executive summary and NP main document draft on the Town Council website.

See next page

Appendix SIX



Cllr Revell
Broseley Town Council
The Library Building
Bridgnorth Road
Broseley
Shropshire
TF12 5EL

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Date: 3rd November 2020

Dear Cllr Revell,

I write in response to your Regulation 14 Consultation on the draft Broseley Neighbourhood Plan.

Unfortunately given current work commitments primarily resulting from the recent consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, we have not had the opportunity to extensively review the Regulation 14 draft of the Broseley Neighbourhood Plan. However, as you are aware, we previously provided informal feedback on an early draft of the Broseley Neighbourhood Plan and consider these comments remain relevant (attached as an Appendix).

Within this earlier correspondence we indicated that as the statutory body, Shropshire Council is responsible for undertaking Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening of the draft Broseley Neighbourhood Plan and that we would undertake this screening once we had a full understanding of the proposals within the draft Broseley Neighbourhood Plan at the Regulation 14 stage.

SEA Screening Opinion

This letter provides a 'screening' opinion on whether the draft Broseley Neighbourhood Plan falls within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004, and therefore whether a Strategic Environmental Assessment (SEA) is required. In providing this 'screening' opinion, the Council has had regard to the contents of the draft policies proposed within the draft Broseley Neighbourhood Plan, as well as the extent of the environmental assessment already undertaken as part of Shropshire Council's emerging Local Plan Review (currently undergoing Regulation 18 consultation).

NPPG provides guidance on the requirements of Neighbourhood Plans in relation to meeting Environmental Assessment requirements. Specifically the guidance states "*In some limited circumstances, where a [neighbourhood plan](#) is likely to have significant environmental effects, it may require a strategic environmental assessment.*" The requirements of the Screening opinion are established in Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. A basic condition for Neighbourhood Plans is that they are compatible with European Union obligations, including the SEA Directive, and this has been taken into account in this 'screening' opinion.

The Shropshire Core Strategy (2011), SAMDev Plan (2015) and the emerging Local Plan Review have been subject to Sustainability Appraisal (SA) which has incorporated the requirements of the SEA Directive. The emerging Local Plan Review, covering the plan period 2016-2038, provides strategic policies and identifies Broseley as a Key Centre within the settlement framework. For Broseley it provides a settlement strategy (Draft Policy S4) which identifies the overall scale of housing and employment for the town over the plan period (2016-2038) and the extent of the development boundary. The Draft Local Plan does not propose to allocate any sites for residential development or employment, as this role is being taken by the emerging Neighbourhood Plan in agreement with the Broseley Neighbourhood Advisory Group (NPAG).



www.shropshire.gov.uk
General Enquiries: 0345 678 9000

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038
Consultation Statement

It is important to consider the nature and scope of the draft Broseley Neighbourhood Plan. In doing so it is acknowledged:

- The end of the plan period is consistent with the emerging Local Plan Review;
- Given the advanced stage of the Neighbourhood Plan process, Shropshire Council has not proposed to allocate any land for employment or residential development. When adopted (or 'made') the Neighbourhood Plan will establish the long-term delivery strategy for the town. It is therefore only considered necessary for the Shropshire Local Plan to provide the overall strategy over the plan period by establishing the localised housing and employment guidelines as well as establishing a development boundary for the settlement. Should the Neighbourhood Plan propose site allocations and alterations to the development boundary the Policies Map will be amended to reflect these changes.

In taking these considerations into account, and having assessed the broad scope and content of the proposed draft policies, it is considered an SEA (Strategic Environmental Assessment) **would** be required for the Broseley Neighbourhood Plan, except for those elements of the Neighbourhood Plan which relate to the level of growth being proposed for residential and employment development (assuming these remain consistent with that proposed in the emerging Shropshire Local Plan Policy S4).

Therefore, and for clarity, Shropshire Council does not screen out the need for SEA to be carried out on the draft Broseley Neighbourhood Plan.

In order to provide support on this issue, Shropshire Council advise the NPAG has three options in order to satisfy the obligations of the SEA Directive:

1. Utilise the Sustainability Appraisal (SA) carried out by Shropshire Council for carrying out the site assessment process for Broseley. This is at: <https://shropshire.gov.uk/media/15555/appendix-e-broseley-place-plan-area-site-assessments.pdf> Shropshire Council's SA process has been designed to incorporate the requirements of the SEA Directive and this has been subject to consultation with the three main environmental bodies – Environment Agency, Natural England and English Heritage. The NPAG will need to ensure that the Shropshire SA covers all the sites they are considering. If not, it should be relatively straight forward to assess any extra sites using our scoring system.
2. Use our Sustainability Appraisal methodology to carry out their own assessment of sites. Our methodology is set out in our SA Scoping Report <https://shropshire.gov.uk/media/7274/sa-scoping-report.pdf> but note that Shropshire Council have amended some elements as our own SA has progressed. These changes are documented in chapter 9 of our SA Report for the Regulation 18 consultation (the Environmental Report) at: <https://shropshire.gov.uk/media/15538/sustainability-appraisal-environmental-report-regulation-18-pre-submission-draft-of-the-shropshire-local-plan.pdf>. For your information, we consulted on our SA Scoping Report in autumn 2016 and finalised it in early 2017 after comments from statutory consultees and the public. We have used the methodology from our Scoping Report for our assessment of all LPR policies and sites throughout all stages of the Plan to date.
3. Develop your own SEA methodology and apply that as part of their site assessment process.

Please note this Screening Opinion has not been subject to consultation with statutory consultees. Furthermore, should the scope or content of the draft Broseley Neighbourhood Plan change, the Council reserves the right to reconsider this 'screening' opinion.

HRA Screening Opinion

HRA Screening will also be required, however we will arrange for this after the consultation period has concluded.

Please note that this is an officer response and we reserve the right to make further comments on the draft Broseley Neighbourhood Plan following completion of the SEA, HRA Screening and any further associated assessments.

Yours sincerely

Daniel Corden
Planning Policy Team
Shropshire Council

ends