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Shrewsbury Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire,

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CABINET

TO FOLLOW REPORT (S)

8 Recommendation for Broseley Neighbourhood Development Plan to proceed to referendum (Pages 1 - 126)

Lead Member – Councillor Ed Potter – Deputy Leader and Portfolio Holder for
Economic Growth, Regeneration and Planning

Report of Mark Barrow, Executive Director of Place, to follow

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Committee and Date
20th July 2022

Item

Public

Recommendation for Broseley Neighbourhood Development Plan to Proceed to Referendum

Responsible Officer

Mark Barrow, Executive Director - Place

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1. Synopsis

This report seeks Cabinet approval to proceed to local referendum on the Broseley Neighbourhood Development Plan.

2. Executive Summary

- 2.1. This report seeks Cabinet approval for the Broseley Neighbourhood Development Plan (the Plan) to proceed to referendum to determine if the Plan should become part of the statutory Development Plan for the neighbourhood area, and therefore to be used in the determination of planning applications in the neighbourhood.
- 2.2. The Broseley Neighbourhood Development Plan (also referred to as the Neighbourhood Plan) has been produced in accordance with the Neighbourhood Planning (General) Regulations 2012 (referred to in this report as 'the regulations'). The Plan has been prepared by the Broseley Neighbourhood Plan Steering Group, with Broseley Town Council acting as the local 'Qualifying Body'. Work on the Plan began in 2018 and has included a number of consultation stages. Broseley Parish Council submitted the draft version of the plan to Shropshire Council in May 2021, after which Shropshire Council undertook further statutory consultation and appointed an independent person to conduct the examination into the plan.
- 2.3. The purpose of the independent examination process is to ensure Neighbourhood Development Plans meet a set of nationally prescribed 'Basic Conditions', and to recommend if the Plan should proceed to a local referendum. The examination into the Broseley Neighbourhood Plan concluded in March 2022. The Examiner's Report is attached to this Report as Appendix 1

- 2.4 The Examiner has recommended the Plan can proceed to local referendum, subject to a number of modifications being made. It is now Shropshire Council's role to consider the outcome of the Examiner's report, including the proposed modifications, and to agree if the plan can proceed to referendum.
- 2.5 The schedule of modifications is shown in Appendix 2. This schedule has followed consideration of the Examiner's conclusions and proposed modifications. Appendix 3 to this report sets out the proposed final 'referendum' version of the Broseley Neighbourhood Development Plan. It is therefore recommended that the 'referendum' version of the Plan proceed to referendum.
- 2.6 If agreed, the referendum will take place on a date to be agreed, but, must be between 1st September and 6th October 2022. Should the Plan gain public support at the referendum, Shropshire Council's Full Council will be asked to formally 'make' (adopt) the Broseley Neighbourhood Development Plan to form part of the Statutory Development Plan for Shropshire.

3. Recommendations

Cabinet agrees:

- 3.1. The Broseley Neighbourhood Development Plan meets the 'basic conditions' and all the other legal requirements as summarised in the Independent Examiner's Report, subject to the modifications proposed in the Schedule of Modifications (Appendix 2)
- 3.2. The required modifications be agreed, and that the final 'referendum' version of the Broseley Neighbourhood Development Plan (May 2022) (Appendix 3) proceed to local referendum.
- 3.3. The referendum area be that as defined as the designated area to which the Neighbourhood Development Plan relates, i.e. the Broseley parish boundary.
- 3.4. The Executive Director of Place be authorised to exercise all the relevant powers and duties and undertake necessary arrangements for the Broseley Neighbourhood Development Plan Referendum Version (May 2022) (Appendix 3) to now proceed to Referendum and for the Referendum to place asking the questions 'whether the voter wants Shropshire Council to use this neighbourhood plan for the Broseley Neighbourhood Plan area to help it decide planning applications in this neighbourhood area'.

REPORT

4. Risk Assessment and Opportunities Appraisal

- 4.1. Having received a draft Neighbourhood Plan from a qualifying body (normally a Parish or Town Council), it is the responsibility of the Local Planning Authority, under regulation 16 of the Neighbourhood Planning (General) Regulations 2012, to publicise and to seek representations on the Plan. It is also the responsibility of the Local Planning Authority under paragraph 7 of Schedule 4B to the Town and Country Planning Act 1990 (TCPA1990) to appoint an independent person to assess the Plan. In following these requirements Shropshire Council published and consulted on the submission version of the Broseley Development Plan for eight weeks between 23rd July and 17th September 2021 and appointed Tony Burton to examine the Plan in January 2022. As required Mr Burton's appointment was agreed by Broseley Parish Council.
- 4.2. Only a draft Neighbourhood Plan that meets the basic conditions can be put to a referendum and be 'made' (adopted) by the Local Authority. The basic conditions, as set out in paragraph 8(2) of Schedule 4B of the TCPA 1990 that apply to Neighbourhood Development Plans by the Planning and Compulsory Purchase order 2004, are:
- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - the making of the neighbourhood plan contributes to the achievement of sustainable development;
 - the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - the making of the neighbourhood plan does not breach, and is otherwise compatible with, retained EU obligations;
 - prescribed conditions are met (in relation to the neighbourhood plan) and prescribed matters have been completed with in connection with the proposal for the neighbourhood plan.
- 4.3 In assessing the Plan the examiner has three options:
- a) that the plan proceeds to referendum as submitted;
 - b) that the plan is modified by the LPA to meet 'basic conditions' and then the modified version proceeds to referendum; or
 - c) that the plan does not proceed to referendum

The neighbourhood development plan examination is therefore a particularly focussed process, unlike that of an examination applied to Local Plans prepared by Local Planning Authorities. This leaves little in the way of opportunity to actively make changes to improve the plan at this stage, unless these changes (or modifications) are to ensure the Plan meets one or more of the basic conditions.

- 4.4 The Examiner's Report is included as Appendix 1 to this report. It is the role of Shropshire Council to consider the overall conclusions and the proposed modifications in the Examiner's Report. Whilst the Examiner's Report is not binding on the authority, it is considered there is a risk of a legal challenge if the local authority's conclusions were to differ significantly from that of the Examiner's without appropriate rationale. However, it is considered there will be occasions where it may be necessary for the Local Authority to propose different modification to that proposed by the Examiner or indeed to disagree with the need for a modification.
- 4.5 In this instance, the Examiner's Report into the Broseley NDP has concluded that it be modified by the Local Planning Authority to meet the basic conditions. It should be this modified version of the Plan which should proceed to referendum. The Schedule of Modifications attached as Appendix 2 to this report show how the Local Planning Authority has considered each of the proposed modifications proposed by the Examiner.
- 4.6 Officers have considered in detail the recommendations of the Examiner, supported by further discussions with Broseley Town Council. In summary, it is proposed that all of the recommended changes to the Plan are incorporated into the final 'referendum' version. It is this version which is before Cabinet and included as Appendix 3. For clarity, it is considered these changes are necessary in order for the Plan to meet its 'basic conditions'. Whilst these changes do impact on a number of proposed policies, and in some cases include the removal of policies, it is not considered these changes taken as a whole fundamentally impact on the wider objectives of the Plan. It should be noted the proposal to incorporate site allocations for new housing and employment land are unchanged from the earlier version of the Plan developed by the Broseley Neighbourhood Plan Steering Group.
- 4.7 The Examiner's report also recommends the Referendum Area be restricted to the neighbourhood plan area, i.e. the Parish boundary, as the plan does not have a substantial, direct and demonstrable impact beyond the neighbourhood area. Assuming Cabinet approve the Plan to proceed to referendum, the Council's Electoral Services will administer this process in line with Neighbourhood Plan Regulations, which specifies that this should take place no more than 56 days from the publication of the decision statement. Taking

into account the necessary notice periods it is considered the referendum will take place between 1st September and 6th October 2022. It is considered there is little risk to the Council if this process follows the regulations closely.

5. Financial Implications

- 5.1. The Localism Act and Regulations provide that the following costs would fall to Shropshire Council: delivering a supporting role particularly in the latter stages of the Plan's development; appointing an Examiner for the Plan; and conducting an Examination and holding a Referendum. Current provisions allow an application for these additions cost to be met, and a reimbursement of costs will there be sought from Central Government. It is considered likely the robustness of the Neighbourhood Plan Policies will be tested over time by independent Planning Inspectors on Planning appeals made under Section 78 of the TCPA1990. Members are advised that the liability for the future appeal costs rests with Shropshire Council as Local Planning Authority and as such the usability of such plans and their impact on local decision making will need to be carefully monitored. However, it should be noted that in seeking approval to proceed to referendum on this Plan, there is agreement that the content of the Neighbourhood Development Plan is in broad conformity with the policies of Shropshire's adopted Local Plan. It is therefore considered there is very limited risk to Shropshire Council and additional financial liability as a result of this report and recommendations.

6. Climate Change Appraisal

- 6.1. **Energy and fuel consumption:** The recommendations propose that Cabinet agree to proceed to referendum with the Broseley Neighbourhood Development Plan. If successful at referendum, and the Plan is subsequently adopted by the Council, it will become part of the statutory Development Plan for the area and will be used in the determination of planning applications. Policy SD1 of the Plan includes a need for development proposals to be designed to be energy efficient and sustainable.
- 6.2. **Renewable energy generation:** Whilst not specifically identified in the Neighbourhood Development Plan, the Plan is in general conformity with the current Local Plan and the emerging Local plan Review, which include a positive policy framework for supporting appropriate renewable energy schemes
- 6.3. **Carbon offsetting or mitigation:** The proposed referendum version of the Plan includes the following objective – Achieving Sustainable Development and Responding to Climate Change

- 6.4 **Climate Change adaptation:** The proposed referendum version of the Plan includes the following objective: Achieving Sustainable Development and Responding to Climate Change

7. Background

- 7.1. Shropshire Council supports Neighbourhood Development Plans being brought forward under the Localism Act and the 2012 Neighbourhood Planning Regulations, indeed the Council is legally obliged to do so. The Government's National Planning Policy Framework (NPPF) supports the principle of Neighbourhood Plans and their status as part of the Development Plan. The NPPF states "Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies". It is also made clear that Neighbourhood Development Plans should not promote less development that set out in the strategic policies for the area or undermine those strategic policies.
- 7.2. Neighbourhood Development Plans must follow a defined regulatory process in both their preparation and adoption. This includes the formal designation of the area (Regulation 6 Stage), the consultation on a draft version of the Plan (Regulation 14 Stage), submission to the Local Planning Authority (Regulation 15 Stage), and consultation and examination on the Final Draft version of the Plan (Regulation 16 Stage).
- 7.3. Broseley Town Council formally requested that the parish of Broseley be designated as a Neighbourhood Area in April 2018 and, following a period of consultation this was formally agreed by Shropshire Council in September 2018. A Neighbourhood Plan Steering Group was established locally to undertake the preparation of the Plan. This group included representatives from the Town Council and other local volunteers. It is acknowledged that from an early point in this process the Steering Group provided positive opportunities for the local community to have their say in the vision and objectives of the Plan through a range of means, including public meetings, meetings with landowners and businesses, drop-in displays, information on the website and Community Questionnaires throughout the process.
- 7.4 Between September and October 2020 Broseley Town Council undertook a statutory six week consultation into the pre-submission version of the Neighbourhood Development Plan (Regulation 14 Stage). This draft version of the Plan responded to the survey evidence and contained a number of draft Development Management policies.

- 7.5 In May 2021 Broseley Town Council submitted the Neighbourhood Development Plan to Shropshire Council (Regulation 15 Stage), along with the required Consultation Statement and Basic Conditions Statements. In meeting our statutory requirement, Shropshire Council proceeded to carry out the Regulation 16 stage consultation between July and September 2021 with statutory consultees and other locally interested individuals and organisations and in January 2022 appointed Tony Burton to examine the Plan. As required by the Regulations, the appointment of Mr Burton was agreed by Broseley Town Council.
- 7.6 Mr Burton's examination of the Broseley Neighbourhood Development Plan was carried out by written representations only. As well as the Plan documents, Mr Burton also considered the representations made to the Regulation 16 stage consultation. The conclusions of this consultation were subsequently considered in the Examiner's final report.
- 7.7 If Cabinet agree for the Broseley Neighbourhood Development Plan to proceed to referendum, the question will be:
- Do you want Shropshire Council to use the Broseley Neighbourhood Development Plan to help decide planning applications in the neighbourhood area?*
- 7.8 The Plan will need to gain the support of over 50% of those who cast a vote to be able to move forward to be 'made' (adopted) by Shropshire Council. If this is the case the decision to 'make' the Plan will need to be taken to Full Council. A date for the referendum will be formalised after 20th July assuming the recommendations are agreed.

8. Additional Information

- 8.1. The appendices to this report provide information on the Examiner's report into the Neighbourhood Plan, the proposed modifications, and the final 'referendum' version of the Plan which incorporates all the required modifications.

9. Conclusions

- 9.1. Further to the outcomes of the Examiner's report into the Broseley Neighbourhood Development Plan, it is recommended that all the necessary modifications are agreed and that the final version of the Plan proceed to local referendum.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Cabinet Report 17th September 2018 – application by Broseley Town Council to be considered as a Neighbourhood Plan Area

Cabinet Member (Portfolio Holder)

Cllr Ed Potter

Local Members

Cllr Caroline Bagnall, Cllr Dan Thomas

Appendices

1 Examiners Report

2 Schedule of Modifications

3 Final version of Broseley Neighbourhood Development Plan for Referendum

BROSELEY NEIGHBOURHOOD PLAN

Report to Shropshire Council of the Independent Examination

By Independent Examiner, Tony Burton CBE BA MPhil (Town Planning) HonFRIBA FRSA

Tony Burton
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March 2022

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1. Executive Summary

1. I was appointed by Shropshire Council with the support of Broseley Town Council to carry out the independent examination of the Broseley Neighbourhood Plan.

2. I undertook the examination by reviewing the Plan documents and written representations, and by making an unaccompanied visit to the Neighbourhood Area.

3. I consider the Plan to be an adequate expression of the community's views and ambitions for Broseley. It is based on an effective programme of public consultation which has informed a Community Vision to 2038 supported by plan objectives. This is to be achieved through nine policy themes and a set of 24 objectives and 44 planning policies dealing with issues distinct to the locality. There is a commitment to supporting implementation and monitoring of the Plan and to a future review. The Plan is supported by a Consultation Statement and Basic Conditions Statement and has been screened to determine whether full Strategic Environmental and Habitats Regulations Assessments are required. An Appropriate Assessment has been undertaken. There is supporting evidence provided and there is evidence of community support and the involvement of the local planning authority.

4. I have considered the 11 separate representations made on the submitted Plan. These are addressed in this report as appropriate.

5. Subject to the recommended modifications set out in this report I conclude that the Broseley Neighbourhood Plan meets all the necessary legal requirements, including satisfying the Basic Conditions. I make a number of additional optional recommendations.

6. I recommend that the modified Plan should proceed to Referendum and that this should be held within the Neighbourhood Area of Broseley parish.

2. Introduction

7. This report sets out the findings of my independent examination of the Broseley Neighbourhood Plan. The Plan was submitted to Shropshire Council by Broseley Town Council as the Qualifying Body.

8. I was appointed as the independent examiner of the Broseley Neighbourhood Plan by Shropshire Council with the agreement of Broseley Town Council.

9. I am independent of both Broseley Town Council and Shropshire Council. I do not have any interest in any land that may be affected by the Plan. I possess the appropriate qualifications and experience to undertake this role.

10. My role is to examine the Neighbourhood Plan and recommend whether it should proceed to referendum. A recommendation to proceed is predicated on the Plan meeting all legal requirements as submitted or in a modified form, and on the Plan addressing the required modifications recommended in this report.

11. As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). To comply with the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
- contribute to the achievement of sustainable development; and
- be in general conformity with the strategic policies of the development plan in the area; and
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations, including the Conservation of Habitats and Species Regulations 2017.

12. An additional Basic Condition was introduced by Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in 2018 that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. I am also required to make a number of other checks under paragraph 8(1) of Schedule 4B of the Town and Country Planning Act 1990.

13. In undertaking this examination I have considered the following documents as the most significant in arriving at my recommendations:

- the submitted Broseley Neighbourhood Plan
- the Basic Conditions Statement
- the Consultation Statement
- Strategic Environmental Assessment and Habitats Regulations Assessment screening statements and Appropriate Assessment
- the relevant parts of the development plan comprising the Shropshire Core Strategy (2006-2026) and Shropshire Site Allocations and Management of Development (SAMDev) Plan (2006-2026)
- representations made on the submitted neighbourhood plan
- relevant material held on the Broseley Town Council and Shropshire Council websites
- National Planning Policy Framework (2021)
- Planning Practice Guidance
- relevant Ministerial Statements

14. I have also given due consideration to the current review of the Shropshire Local Plan (2016-2038) which is at Examination. The Plan was prepared under an earlier version of the National Planning Policy Framework than that used for my examination but the consultation on the submitted Plan took place after the most recent NPPF's publication in July 2021.

15. No representations were received requesting a public hearing and having considered the documents provided and the representations on the submitted Plan I was satisfied that the examination could be undertaken by written representations without the need for a hearing.

16. I carried out an unaccompanied visit to the Neighbourhood Area on a weekday during January. I visited the main locations addressed in the Plan, including the proposed changes to the development boundary, the shopping and employment areas, the proposed areas of Valuable Green Space and a selection of local footpaths. I considered the relationship with the World Heritage Site and saw examples of recent development.

17. Throughout this report my recommended modifications are bulleted. Where modifications to policies are recommended they are highlighted in **bold** print with new wording in “speech marks”. Existing wording is in *italics*. Modifications are also recommended to some parts of the supporting text. These recommended modifications are numbered from M1 and are necessary for the Plan to meet the Basic Conditions. A number of modifications are not essential for the Plan to meet the Basic Conditions and these are indicated by [square brackets]. These optional modifications are numbered from OM1.

18. Producing the Broseley Neighbourhood Plan has clearly involved significant effort over many years led by the Advisory Group. The process began in 2017 and is informed by significant community involvement. There is evidence of collaboration with Shropshire Council and continuing this will be important in ensuring implementation of the Plan. The commitment of all those who have worked so hard over such a long period of time to prepare the Plan is to be commended and I would like to thank all those at Shropshire Council and Broseley Town Council who have supported this examination process.

3. Compliance with matters other than the Basic Conditions

19. I am required to check compliance of the Plan with a number of matters.

Qualifying body

20. The neighbourhood plan has been prepared by a suitable Qualifying Body – Broseley Town Council – which being a town council is the only organisation that can prepare a neighbourhood plan for the area.

Neighbourhood Area

21. I am satisfied that the Plan relates to the development and use of land for a designated neighbourhood area which comprises the parish area of Broseley Town Council and was agreed by Shropshire Council on 17 September 2018.

22. The boundary of the neighbourhood area can be discerned from the map on page 5 which references it as the “Town Council Boundary”. This is not at a scale that allows the detailed boundary to be determined and no link is provided to where the boundary is available online. The map is unnumbered and has two titles “*Broseley Key Information*” and “*Broseley – Key Assets*”.

- M1 – Confirm in the supporting text and/or legend that the Town Council Boundary and neighbourhood area are the same and provide a link to where the boundary can be viewed at a larger scale

Land use issues

23. With minor exceptions identified below I am satisfied that the Plan’s policies relate to relevant land use planning issues.

Plan period

24. The period of the neighbourhood plan runs from 2020 to 2038 and the 2038 end date aligns with the period of the Shropshire Local Plan review. The period is shown on the cover and included in a header on each page of the Plan.

Excluded development

25. I am satisfied that the neighbourhood plan makes no provisions for excluded development (such as national infrastructure, minerals extraction or waste).

4. Consultation

26. I have reviewed the Consultation Statement and relevant information provided on the Broseley Neighbourhood Plan website. This provides a clear record of the consultation process that has been undertaken since 2017 under the guidance of the Advisory Group which included a mix of town councillors and interested members of the public. The public consultation process has been adequately open and transparent.

27. A number of different engagement methods have been used, including a website, public meetings, online surveys, street meetings and regular use of social media. At the time of the Examination the Town Council website's information about the Plan was out of date. A specific survey of views on different development sites was undertaken. Participation levels have been good with more than 400 questionnaires returned on the initial online survey, representing almost one fifth of the population, and over 250 responses to the survey on potential development sites. A further consultation in 2019 elicited nearly 200 responses. A number of public meetings were held on specific themes, including heritage and environment and public services. Some specific consultation with both local businesses and landowners was undertaken. Information was displayed and provided in the local library. Shropshire Council provided informal comments on the emerging Plan before formal consultation on the draft. There is evidence of strong support from the public for the approach presented in the Plan.

28. The Plan was subject to Regulation 14 consultation between 12 September 2020 and 3 November 2020. This included documents being placed online and promoted through social media and on local noticeboards. Printed copies of the draft plan were placed in the library and key stakeholders were contacted directly by email. There is evidence of the consultation including the required statutory and other consultees. While very few responses were received I consider an adequate process has been followed.

29. The Consultation Statement states that *"The policies that can be seen in the current Plan evolved through these consultations"* but this was not supported by direct evidence of

the changes made. A document summarising changes to the Plan's policies in response to representations from Shropshire Council was available to me via the Town Council website. On requesting further information from the Town Council I was provided with a summary of changes made in response to other representations.

30. 11 separate representations have been made on the submitted Plan including from individuals, statutory bodies, a national charity and a neighbouring Town Council. All the representations have been considered and are addressed as appropriate in this report. A number of representations make suggestions for changes to the Vision or Objectives of the Plan or for the inclusion of additional policies. These include representations from West Mercia Police on designing out crime. The suggestions are reasonable but the scope and content of the Plan is a matter for Broseley Town Council as the Qualifying Body and it is more appropriate to make such representations at an earlier stage of consultation on the pre-submission draft Plan. They might also be considered if there were to be a review of the Plan at a future date.

31. I am satisfied with the evidence of the public consultation undertaken in preparing the Plan since 2017. The Plan has been subject to wide public consultation at different stages in its development. While the number of responses to the Regulation 14 consultation is low, the participation rates have generally been good. The process has allowed community input to shape the Plan as it has developed and as proposals have been firmed up. Local businesses, landowners and the local planning authority have been engaged through the process.

5. General comments on the Plan's presentation

Community Vision and Objectives

32. The Plan includes a short Community Vision. This reflects the feedback received through consultation and is consistent with the themes, objectives and policies in the Plan. The overall approach combines a desire to look after the existing character while securing a viable economy and vibrant community. It is consistent with sustainable development.

Other issues

33. The policies are not easily distinguished from the rest of the Plan and the identifying codes are inconsistently presented with varying use of capitals and full stops (e.g. Policy A1, Policy DS.1 and POLICY HO1). It is essential that the policies are clearly differentiated from other aspects of the Plan.

- M2 – Clearly differentiate the Plan's policies from the supporting text (such as by using tinted boxes) and be consistent in the format of the identifying code

34. The Plan's format is inconsistent. It includes use of different point sizes for the same level of heading (e.g. *"Foreword"* and *"Introduction"*) and a confused hierarchy of headings. The Contents does not recognise that some sections are sub-sections of others and the sub-headings are inconsistently numbered throughout the Plan. This also results in a confused approach to paragraph numbering. The Contents does not include any of the heading numbers. The text on page 5 is centred. A logical Plan structure would be as follows:

1. Foreword
2. Introduction
 - The National Planning Policy Framework and Shropshire context
 - Broseley – an early industrial town
 - Broseley – key information [moved from earlier section]
 - Preparing the Plan
 - Meeting the Basic Conditions [moved from later section]
3. Plan Vision and Objectives

Community Vision [moved from earlier section]

Objectives

Housing

Employment and jobs

Green Spaces and Green Infrastructure

Traffic and Accessibility

Conservation and Heritage

Community Resources

Sport, Leisure and Recreation

Supporting the Visitor Economy

Achieving Sustainable Development and Responding to

Climate Change

4. Policies

Preparing the Policies

Plan Policies

Design

Housing

Economy and Jobs

Green Spaces and Infrastructure

Community Resources

Supporting the Visitor Economy

Achieving Sustainable Development and responding to Climate
Change [including Water Infrastructure]

5. Monitoring and Review

6. Appendices

35. There is logic in the heading for each of the Plan's Objectives being the same as the Plan's policies with the addition of a policy section on design. There are no policies relating to sport and recreation. Policy CH2 relates to green spaces and infrastructure rather than conservation and heritage and should be relocated. Policy CH1 duplicates existing policy and so the section on "*Conservation and Heritage*" should be deleted.

- M3 – Amend the Plan to provide a consistent approach to the structure, hierarchy and paragraph numbering and use consistent headings

36. The map extracts are not consistently numbered and they are not included in the Contents. There are a number of further issues:

- Five maps (pages 5, 9, 42, 43 and 44) lack any identifying number and there are two Figure 1s (pages 38 and 40)
- The map on page 9 repeats that on page 43 which can be deleted and in the retained map (a) the area covered should be extended to include the whole of the area of the Ironbridge Gorge World Heritage Site/Ironbridge Gorge Conservation Area within the parish and (b) “*World Heritage Site*” in the Key should be replaced with “Ironbridge Gorge World Heritage Site/Ironbridge Gorge Conservation Area” to clarify the Conservation Area status.
- The Map on page 5 is not numbered and has two potential headings “*Key Information*” and “*Key Assets*”.
- The boundary of the World Heritage Site shown on page 9 differs from that of the Conservation Area on page 5 by extending further south along Ironbridge Road than the junction with Calcutts Road and this acknowledged error should be corrected
- The Policies Map on page 42 provides important information and should be located in the Introduction. It is more accurately titled a “Policies and Proposals Map” and the following changes are needed to the Legend:
 - “Proposed” Broseley Development Boundary
 - “Proposed” Valued Green Space [delete text in brackets and see later recommendation on re-naming these to Local Green Spaces]
 - “Existing” Designated Retail Area
 - “Existing Employment Area”

37. The “*Employment Area*” between Pound Lane and Avenue Road is now replaced by the consented residential and employment development adjacent to the Policy HO2 allocation, as described in Appendix 5.

38. The Town Plan map on page 44 is a source of potential confusion given the differences with the Proposals Map. If the purpose for its inclusion is to show the existing Development Boundary then a simplified map showing just this would aid clarity of the Plan and be consistent with other recommendations on how to depict the proposed change to the Development Boundary.

39. The population of Broseley is identified as 5,600 on page 5 and 4,929 on page 7 using different sources.

40. It is not for the Examination to prescribe the structure of the Plan. The clarity of the Plan is, however, a matter for the Basic Conditions and modifications to provide this clarity are necessary.

- M4 – Amend the Plan to provide greater clarity in the use and presentation of maps reflecting the feedback provided in this report
- OM1 – [Be consistent in the use of supporting data throughout the Plan]

41. The Plan includes references to a number of documents which comprise the evidence base. It does not provide details or links to many of these documents and there is no single source for the Plan's evidence base provided online. The majority of the evidence base documents are not made available on the Town Council's website.

- OM2 – [List all the evidence base documents used in the Plan in an Appendix along with links where available and consider providing a section of the Town Council's website which brings together all the documents in the Plan's evidence base into a single location.]

6. Compliance with the Basic Conditions

National planning policy

42. The Plan is required to “*have regard*” to national planning policies and advice. This is addressed in the Basic Conditions statement which relates each of the Plan’s policies and objectives to the National Planning Policy Framework (NPPF) (February 2019). A new National Planning Policy Framework was published after the Basic Conditions Statement was prepared and before the Examination. I do not consider the changes to national planning policy to be material in terms of the Plan’s ability to meet this Basic Condition and I agree with Broseley Town Council’s view, provided on request, that the Basic Conditions statement shows “*conformity with the 2021 edition of the NPPF*”.

43. The Basic Conditions Statement provides a table that tests compatibility of each of the Plan’s objectives with relevant sections of the National Planning Policy Framework and a further table that compares the Plan’s policies with the relevant sections of the National Planning Policy Framework, supported by a brief commentary. It concludes that “*the Basic Conditions Statement demonstrates that the NDP [neighbourhood development plan] has regard to the relevant policies of the NPPF*”.

44. The assessment provided is relatively limited and generally comprises a description of the purpose of the Plan policy. No conflicts are identified. The assessment is also partial as policies A1 and DS1 – DS10 are missing. I requested an update to the Basic Conditions Statement to address this and one was provided. It identified no conflicts.

45. Overall the analysis does serve to demonstrate that consideration has been given to national planning policy.

46. I address some conflicts with national planning policy in my consideration of individual policies and recommend some modifications. There are also some areas where the drafting of the Plan’s policies needs to be amended in order to meet the National Planning Policy Framework’s requirement for plans to provide a clear framework within which decisions on planning applications can be made. The policies should give a clear

indication of *“how a decision maker should react to development proposals”* (paragraph 16). It is also important for the Plan to address the requirement expressed in national planning policy and Planning Practice Guidance that *“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”* (NPPG Paragraph: 041 Reference ID: 41-041-20140306). The Plan’s policies do not always meet these requirements and a number of recommended modifications are made as a result.

47. Generally, I conclude that the Plan has regard to national planning policy and guidance but there are exceptions as set out in my comments below. These cover both conflicts with national planning policy and the need for some policies to be more clearly expressed and/or evidenced or for duplication with other planning policies to be avoided.

48. I am satisfied that the Plan meets this Basic Condition other than where identified in my detailed comments and recommended modifications to the Plan policies.

Sustainable development

49. The Plan must *“contribute to the achievement of sustainable development”*. This is addressed in the Basic Conditions Statement by a brief assessment of how relevant Plan policies contribute to each of the economic, social and environmental dimensions of sustainable development. It concludes that this *“demonstrates that the Broseley NDP provides a balance of economic, social and environmental policies that confirm to the requirements of the NPPF”*.

50. The assessment is broad brush and succinct in its approach. It is also partial as policies A1, DS1 – DS10, VE1, WA1 and CH1 – CH2 are missing. I requested an update to the Basic Conditions Statement to address this. This was provided and it identified no conflicts.

51. Although the Basic Conditions Statement provides a bare minimum of information my own assessment of the Plan is that it is consistent with the Basic Conditions and I am satisfied that the overall contribution of the Plan to sustainable development is positive.

Development plan

52. The Plan must be *“in general conformity with the strategic policies of the development plan”*. The Basic Conditions Statement addresses this by relating the most relevant Local Plan and neighbourhood plan policies to each other and providing a brief commentary. The Basic Conditions Statement incorrectly identifies the Shropshire Local Plan Review 2016 – 2038 as being part of the development plan although it also recognises that the Plan need not be tested against it.

53. The assessment concludes that the Plan *“is in general conformity”*. No conflicts or departures are identified.

54. The approach is very limited and it is partial as Policy A1 is missing. It includes an erroneous reference to Policy DS110. I requested an update to the Basic Conditions Statement to address the omission. This was provided and it identified no conflicts.

55. Shropshire Council made representations on the consultation draft Plan. These did not raise general conformity issues and when requested for a view on the submitted Plan it said *“Shropshire Council considers that the draft Broseley Neighbourhood Plan to be in general conformity with the strategic policies of the adopted development plan and the draft development plan.”*

56. In the absence of strong evidence in the Basic Condition Statement I have considered general conformity in my own assessment of each of the Plan’s policies. I am satisfied the Plan meets this Basic Condition other than where identified in my detailed comments and recommended modifications to the Plan policies.

Strategic Environmental Assessment

57. The Plan must be informed by a Strategic Environmental Assessment if it is likely to have significant environmental effects. Broseley Town Council published a Screening Statement prepared by a planning consultant that concluded the Plan *“is unlikely to have any significant environmental effects and is therefore screened-out of the SEA process”*. I am satisfied by the robustness of the approach taken by the Screening Statement. Its assessment omits Policy A1 but this is limited in effect and the omission does not bring the overall conclusion into question.

58. The Screening Statement states that Natural England, Environment Agency and Historic England *“will be given an opportunity to comment on this Screening Statement”* and on request I was provided with a copy of the *“targeted consultation”* undertaken by Shropshire Council. Environment Agency responded to *“concur with the SEA report conclusion”* and no response was received from Historic England or Natural England. I note that Historic England made representations on the submitted Plan and did not raise any issues relating to the Strategic Environmental Assessment Screening Statement. Given the evidence that the Plan will not have significant environmental effects I am satisfied with this approach.

59. I conclude that the Plan meets this Basic Condition.

Habitats Regulations Assessment

60. The Plan must be informed by a Habitats Regulations Assessment if it is likely to lead to significant negative effects on protected European sites. Broseley Town Council published a Screening Report on the submitted plan prepared by Shropshire Council that identified housing and employment land allocations as a result of policy HO2 and EJ3 that are in excess of those in the adopted development plan. While recognising consistency with the emerging Local Plan it concluded that the lack of a Habitats Regulations Assessments accompanying an examined and approved development plan means that there is not sufficient certainty that appropriate mitigation can be secured to avoid likely significant effects on the Severn Estuary European Marine Site (comprising the Severn Estuary SAC, SPA and Ramsar site) due to changes in water quality. The Screening Statement concluded that

an Appropriate Assessment would be needed for the Plan to proceed with mitigations in place.

61. Broseley Town Council published an Appropriate Assessment prepared by Shropshire Council for the submitted plan. This addressed the Shropshire Water Cycle Study's consideration of the employment and housing growth in the emerging Shropshire Local Plan. This also includes the land allocated for housing and employment development in Plan policies HO2 and EJ3. The Study concludes that improvement in the treatment of waste water upstream of the Severn Estuary European Marine Site can offset the impact of the growth proposed. As a result the Plan needs to mitigate the risk of resulting in significant negative effects by including a policy that will require water and sewerage infrastructure to keep pace with new development. An appropriate policy has been added to the Plan as Policy WA1. The detail of this policy is addressed later in my report.

62. On request I was provided with a copy of the "targeted consultation" on the Screening Report and Appropriate Assessment with the statutory environmental bodies undertaken by Shropshire Council, including Natural England. It made no comments.

63. I conclude that the Plan includes appropriate mitigation to meet this Basic Condition.

Other European obligations

64. The Plan must be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations. The Basic Conditions Statement asserts that this is the case. No contrary evidence has been presented and on request I was provided with evidence of changes being made to the Plan during its preparation. I conclude that there has been adequate opportunity for those with an interest in the Plan to make their views known and representations have been handled in an appropriate manner with changes made to the Plan.

65. I conclude that the Plan meets this Basic Condition.

7. Detailed comments on the Plan policies

66. This section of the report reviews and makes recommendations on each of the Plan's policies to ensure that they meet the Basic Conditions. I make comments on all policies in order to provide clarity on whether each meets the Basic Conditions. Some of the supporting text, policy numbering, headings and the Contents will need to be amended to take account of the recommended modifications.

Design

67. **Policies A1 and DS.1 to DS.10** – The Plan includes an overarching design Policy A1 alongside ten additional design policies DS.1 – DS.10 which collectively provide design principles for new development.

68. The overarching design Policy A1 makes reference to a "*Design Statement*". There is limited information on how this was prepared and no copy was provided with the submitted document. There is no link to the Design Statement and it is not immediately obvious where it can be obtained. On request I was sent a copy of a two page statement that largely duplicates the design principles included as Plan policies. It also runs to a different time period of 2018 – 2026. It is understood by Shropshire Council that the Design Statement forms part of the Broseley Town Plan and I was informed this was endorsed and adopted as a material consideration for development management purposes by resolution of Shropshire Council on 26th September 2013. Broseley Town Council informed me that the design statement was originally drawn up for the Town Plan in 2012 and was prepared with the assistance of Shropshire Council and local volunteers with professional expertise.

69. The Design Statement does not help the clarity of the Plan and given the level of duplication it does not add anything to its content. References to the Design Statement in the supporting text can largely be replaced by referencing the Plan which will form part of the development plan when made and this will also provide necessary clarity over the time period which will be extended to 2038.

- M5 – Retitle this section as “Design” and delete references to the Design Statement in the policies and supporting text while retaining relevant content. Provide links to the Town Plan and relevant Conservation Area appraisal as supporting evidence for the design principles

70. Policy A1 relates to the design principles but identifies these as being in the Design Statement when they are also in the Plan as individual policies. The policies will become part of the development plan when the Plan is made and will therefore have a different status to the Design Statement. The Plan period also runs further into the future. In addition, the approach is confusing in sometimes relating to development within Conservation Areas, sometimes outside and sometimes either.

71. The design policies do not meet the expectations of Planning Practice Guidance for them to be *“clear and unambiguous”* and *“drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications”*.

72. To meet the Basic Conditions, especially regarding the clarity of the policies, I recommend a restructuring and simplification of the approach to provide a single Design Policy that includes principles and applies to development within and outside Conservation Areas.

73. On the details of some of the policies:

- DS.2 – it is unclear whether all three elements of a new building or extension should be considered. Not all buildings will use brick.
- DS.4 – the first sentence is a description of an important element of Broseley’s character suitable for the supporting text
- DS.5 – the intention of a *“prevailing consideration”* is unclear and this principle is addressed by DS.1
- DS.6 – planning applications do not *“attempt”* to mitigate light pollution and a link to the Institution of Lighting Engineers’ guidance should be provided from the supporting text

- DS.6 – planning applications do not “*attempt*” to provide high quality approaches
- DS.8 – all development plan policies apply to all planning applications as appropriate and it is unnecessary to cross-refer. Planning applications do not “*attempt*” to mitigate the impact of sheet glass and this is addressed by DS.2
- DS.10 – there is a lack of evidence to support a restrictive approach to the use of A-boards and planning applications are determined by the local planning authority and not the Town Council – I recommend this Policy is deleted

74. Policies A1 and DS.1 to DS.10 do not meet the Basic Conditions.

- **M6 – Replaces Policy A1 and DS.1 to DS.10 with:**

“Policy D1

Development proposals that demonstrate due regard to the following design principles will be supported:

- a) **Be in keeping with the form and materials that define the town’s heritage**
- b) **Be of a design and use material that respects local character with regard to:**
 - a. **Floor area, roof pitch and roof height;**
 - b. **Size of windows and facades; and**
 - c. **Style and colour of brickwork and roof tiles as appropriate**
- c) **Where possible retain existing walls and hedges and provide boundary walls on street frontages and hedges elsewhere**
- d) **Incorporate the use of locally distinctive brick and/or stone headers and decorative corbels, cornices and patterned/alternating brickwork on frontages**
- e) **Minimise light pollution and have regard to appropriate Institution of Lighting Engineers’ guidance**
- f) **Provide innovative high quality approaches to meeting the design principles on individual plots**
- g) **Incorporate the use of street furniture using materials, colour and designs that respect local character, including existing street furniture that is retained. “**

Housing

75. The Plan supports the guidelines for residential development in Appendix 5 of the draft Shropshire Local Plan 2016 – 2038. This identifies a need for 50 dwellings in addition to those completed or consented and these are earmarked for windfall sites. Although the revised Local Plan has yet to be adopted there has been no questioning of this approach in representations made on the Plan.

76. The Plan adopts an alternative approach to meeting this outstanding requirement by allocating a site with capacity for 20 homes and assuming a reduced rate of windfall development. It also assumes completion of an exceptions site granted planning permission during the Plan's preparation and Shropshire Council confirmed this to be a reasonable assumption. While no evidence is provided for the revised allowance for windfall sites I am content the Plan makes provision for housing development in strategic conformity with the emerging Local Plan and Shropshire Council shares this view.

77. **Policy HO1** – This supports development on sites within the development boundary that meet local needs and other criteria.

78. This broad approach is consistent with national and local planning policy.

79. Broseley's Development Boundary is defined in the Shropshire Site Allocations and Management of Development (SAMDev) Plan (2006-2026) and shown on the Proposals Map. The Plan proposes amending the boundary and the supporting text should reference where it is established in existing development plan policy.

80. The Plan includes no definition of "*local needs*" by virtue of geography or affordability and the policy is relevant to all housing needs. It lacks clarity in what is meant by "*evidence based affordable housing*". The reference to "*valued green spaces*" should be modified in line with my recommendation regarding the designation of Local Green Spaces in the Plan. I was provided with different definitions of "*infill*" and "*windfall*" sites by Broseley Town Council and Shropshire Council and the Plan includes no definition. Given the dependency of the housing land supply position in the area on windfall sites I consider

this the most appropriate and well defined term to use. A common definition is provided in the National Planning Policy Framework. Windfall sites within the development boundary meet Broseley Town Council's definition of infill sites.

81. The Policy adopts a negative tone in identifying relevant planning considerations as "*limitations*" and that it will be supported "*provided*" criteria are met. Planning policies should be positive.

82. The drafting of the Policy can be strengthened through use of consistent notation for the different considerations, appropriate use of capitals and clarifying whether all considerations should apply in all circumstances.

83. Policy HO1 does not meet the Basic Conditions.

- **M7 – Amend Policy HO1 to:**
 - **Replace the first sentence with "New housing development in Broseley will be supported on windfall sites within the Broseley Development Boundary [ref Proposals Map]."**
 - **Replace c) with "maintain Broseley's Local Green Spaces [ref Proposals Map]; and**
 - **Replace notation i) to iv) with a) to d)**
 - **Replace "*will be supported provided proposals*" with "should"**
 - **Insert "or" at end of subsection iii:**
 - **End the Policy with a full stop**
- **M8 – Reference the definition of the existing Development Boundary in the adopted Shropshire Site Allocations and Management of Development (SAMDev) Plan (2006-2026) in the supporting text**

84. **Policy HO2** – This alters the Development Boundary and designates a site for housing development which should meet criteria set out in an Appendix.

85. The Policy reflects a significant public debate over the preferred location for development in Broseley. It draws on Shropshire Council's preferred sites consultation for the Local Plan which considered alternative sites that were not taken forward. This in turn was based on an earlier site assessment process that considered a larger potential site. This was not taken forward and the circumstances have changed with adjacent development also offering new access. Consultation on potential sites was undertaken during the Plan's preparation with the Avenue Road site identified as a preferable option. There is evidence of landowner engagement.

86. I am satisfied there has been sufficient consideration of alternative sites and appropriate levels of public consultation over the proposed site allocation. My own visit confirms it as an appropriate location for new housing subject to normal planning considerations. The Coal Authority makes representations that *"There may be mine entries on, or around, the Avenue Road site which may have implications for the layout and quantum of development which can be accommodated"* and I recommend that this risk is addressed in the Site Development Criteria.

87. The Policy references *"site allocation criteria"* to be taken into account by any development proposals and these are located in an Appendix. The criteria are appropriate. They relate to the site's development rather than its allocation and so I recommend a renaming..

88. The presentation of the site's location in the map in the Appendix is not at a scale sufficient to identify the detailed boundary.

89. There is no evidence provided supporting the intended capacity for the site of 20 dwellings. On request both Broseley Town Council and Shropshire Council provided relevant planning considerations which may limit capacity, including from the site assessment process undertaken for the Local Plan. I was informed *"This assessment notes that the site includes areas of scrub/woodland, mature trees and hedgerows which are of ecological value and should be retained, whilst this can be incorporated into open space provision it is likely that it would reduce the sites capacity below the general 'starting point'*

for assumptions around site capacity of 30 dwelling per hectare. The assessment also notes that the site may have archaeological interest, which means a heritage assessment will be required to support any Planning Application. It is also understood that there are two routes for electricity cables (pylons located to north and south of the site) running through the north-eastern element of the site which will require appropriate buffering, as will the employment uses associated with the Planning Permission to the north of the site, again likely reducing the site capacity below basic assumptions. Finally, it is important to reflect local character, design and layout (consistent with the adopted and draft Local Plans) and consider other local circumstances, which again can impact on site density.” I recommend inclusion of these considerations in the supporting text to support inclusion of an intended capacity for 20 dwelling sin the policy.

90. The site allocation requires an amendment to the Development Boundary and this needs to be supported by a map at an appropriate scale to view the changes. The current boundary is designated in Policies Map – (S4) Broseley Inset for the adopted SAMDev Plan (2015). It would be preferable to provide a map showing the current and amended boundary in each of the two locations where changes are being made referenced in a single Policy. This should be supported by an appropriate justification for the changes made. In all other locations the Development Boundary should follow the line of the Local Plan policies map.

91. The Policy should be redrafted to provide the necessary clarity in addressing the outcome of its examination.

92. Policy HO2 does not meet the Basic Conditions.

- **M9 - Replace Policy HO2 with “Land off Avenue Road is allocated for housing development with an indicative capacity for 20 dwellings [see Figure ?]. Development proposals for this site should have regard to the criteria in Appendix 5.”**

- M10 – Provide supporting text to Policy HO2 which explains the planning considerations that support an intended capacity for 20 dwellings
- M11 – Amend Appendix 5 to:
 - Provide a large scale map depicting the boundary of the site allocation
 - Replace “*Site Allocation Criteria*” with “Site Development Criteria” and insert “all” after “*meet*” in the first line of this subsection
 - Add an additional criterion “Development to provide around 20 homes”
 - Add an additional criterion “Development to be informed by an assessment of any coal mining legacy risk”
 - Delete “*See next page*”

- **M12 - Insert a new Policy at the beginning or end of the Policies section**
“Policy DB1

The Development Boundary for Broseley is as provided in Figure ?”

- M13 – Provide supporting text to Policy DB1 which explains and justifies the amendment to the Development Boundary in two locations, including maps of sufficient scale showing the new boundary and the two proposed changes

93. **Policy HO3** – This identifies an area of Broseley where “*no new development will be supported*” due to constraints in the road network.

94. The Policy is highly restrictive and would prevent any new building in the defined area. No evidence is provided of the “*severe constraints*” in the road network. On request I was informed the area included many of Broseley's 'jitties' which are “*essentially bridleways, with access only possible for pedestrians or small vehicles*” and accessed down single lane roads with no pavements. I observed these constraints during my visit but the area affected by the Policy is only broadly defined and no map is provided. The Policy also lack necessary clarity as to what categories of development it applies to, relying on a footnote to exclude alterations and extensions.

95. National planning policy expects development plans to be *“prepared positively”* (paragraph 16, NPPF) and for policies to *“be underpinned by relevant and up-to-date evidence”* (paragraph 36, NPPF). The Policy also lacks the clarity required.

96. In the absence of this clarity and sufficient evidence demonstrating the severity of the constraints on the road network or the impact which would arise from new development the Policy does not meet the Basic Conditions.

- **M14 – Delete Policy HO3**

97. **Policy HO4** – This supports affordable housing proposals outside the Development Boundary consistent with the approach in Shropshire’s Local Plan.

98. The Policy defines affordable housing as being for *“local people”* and provided by a *“recognised Housing Association”*.

99. The Shropshire Local Plan addresses provision of affordable homes on exceptions sites in Core Strategy Policy CS11 and an adopted Supplementary Planning Document. This includes a definition of *“local”*. Local Plan policy does not limit providers of affordable homes on exceptions sites to Housing Associations, including, for example, other registered social housing providers. It also includes locational criteria.

100. It is the stated intention of the Policy to be consistent with Local Plan policy on exceptions sites. The Policy departs from this in important aspects and lacks clear definition in its approach. As a result it lacks the clarity necessary for a planning policy.

101. National planning policy is also that policies should *“serve a clear purpose, avoiding unnecessary duplication”* (paragraph 16, NPPF). The Policy goes beyond existing Local Plan policy in only one respect by defining a preference for sites to be within 1200m of the main services in the town centre. No evidence is provided to support this distance. On request I was informed 1200m *“represents a 20 minute walk for a moderately fit adult. Our view is that the BNP should support a ‘walking culture’ and that exception sites should be within*

walking distance of the main services in the Town". It is a requirement of Local Plan policy that *"exception sites must be demonstrably part of, or adjacent to, a recognisable named settlement"* (paragraph 5.13, Adopted Type and Affordability of Housing SPD) which already supports the desired objective.

102. The Policy is supported by some evidence of local needs in an Appendix. This comprises an exchange of emails with Shropshire Council officers and a snapshot assessment of the level of housing need in October 2019 from *"Homepoint"*. A single data point from 2019 does not provide a sufficient evidence base and no detail of what is included on Homepoint is provided. It is inappropriate to include an email exchange with a named officer within the Plan and any data should be provided as a freestanding extract from Shropshire Council. Given my recommendations on the policies relating to the Appendix it should be deleted.

103. Policy HO4 lacks the clarity needed and duplicates existing planning policies. It does not meet the Basic Conditions.

- **M15 – Delete Policy HO4 and Appendix Four**

104. **Policy HO5** – this supports single plot exception sites that are easily accessible to the main services in the town centre and which are not identified a valued green space.

105. The Policy duplicates existing Local Plan policy, including the adopted Supplementary Planning Document. Any proposals for development of valued green spaces will be considered in relation to the development plan policies affording them protection.

106. Policy HO5 does not meet the Basic Conditions.

- **M16 – Delete Policy HO5**

107. **Policy HO6** – This requires proposals for new housing within the Development Boundary to make provision for affordable housing in line with the Local Plan.

108. The Policy duplicates existing provisions in the Local Plan. It does not meet the Basic Conditions.

- **M17 – Delete Policy HO6**

109. **Policy HO7** – This supports new housing development within the Broseley Conservation Area subject to specific criteria.

110. The Policy is drafted in restrictive terms in stating that development will “*only*” be supported which meets the criteria. It is also restrictive in only supporting development of infill sites which complement the surrounding townscape when development of other types of site which meet the same standards would also be appropriate. The drafting takes an unduly restrictive approach to the density of new development which lacks the flexibility to recognise higher density can complement the existing townscape as well as lower density. The negative impact on sight lines should also be significant before it becomes a constraint on new development.

111. The Policy’s requirement that development “*provides benefit*” should be consistent with the legal requirement for all development to “*preserve or enhance*” a Conservation Area.

112. It is unclear whether a development proposal will be considered against all of the criteria or needs to satisfy only one of them to be supported. All of the criteria are not appropriate to some development proposals.

113. The supporting text states that the “*adopted Shropshire Development plan identifies a target of 50 new homes to 2038*”. This refers to a Local Plan which is at Examination and has not yet been adopted.

114. Policy HO7 does not meet the Basic Conditions.

- **M18 – Amend Policy HO7 to:**
 - Delete *“only”* in the first line
 - Replace *“provides benefit”* with *“preserves or enhances”* in a)
 - Replace *“an infill”* with *“a”* in b)
 - Insert *“, where appropriate,”* before *“is able”* in c)
 - Add *“and”* after *“;”* at the end of c)
 - Insert *“significant”* before *“negative”* and delete *“and/or on overall density of provision”* in d)

- M19 – Replace *“adopted”* with *“draft”* in line 3 of paragraph 8.11

Economy & Jobs

115. **Policy EJ1** – This supports employment related development in specific use classes subject to a number of criteria.

116. The Policy requires new development to have a *“positive effect”* or *“impact”* or that it *“promotes”* for it to be supported and this is an unduly restrictive approach for which no evidence is provided. The drafting around the acceptability of impacts on the local road network should be clearer.

117. It is unclear whether a development proposal will be considered against all of the criteria or need satisfy only one of them to be supported.

118. The final criterion g) relates only to a change of use and should be separated from the rest of the Policy. It is unduly restrictive in stating what will *“only”* be supported and lacks clarity over the time period for which the property has been marketed.

119. The Policy relates to Use Classes B and D. The Use Classes Order was amended in September 2020 and I recommend modifying the Policy to refer to the most relevant use classes now in force - Class B2, B8, E, F1 and F2.

120. Policy EJ1 does not meet the Basic Conditions.

- **M20 - Amend Policy E J1 to:**
 - Replace “*B and D*” with “B2, B8, E, F1 and F2”
 - Replace “*have a positive*” with “not have a significant adverse” in a)
 - Insert “a significant adverse” before “*unacceptable*” in b)
 - Replace “*has a positive*” with “does not have a significant adverse” in e0
 - Insert “and” after “;” at end of e)
 - Replace “;” with a full stop at end of f)
 - Make g) a freestanding limb of the Policy
 - Delete “*only*” and insert “for a reasonable period of time” after “*price*” in the former g)

121. **Policy EJ2** – This supports employment related development in specific Use Classes outside the Development Boundary subject to additional criteria.

122. The purpose of the Broseley Development Boundary is to provide certainty as to the most appropriate location for development and to protect land outside it from other than exceptional development or that appropriate to a rural location. The effect of Policy EJ2 is to apply the same criteria to development outside as well as inside the Development Boundary other than in relation to access by heavy goods vehicle. There is no evidence provided of a need to further release of land for employment uses and no evidence is provided as to why access to any such development outside the Development Boundary should be from the specific location.

123. Policy EJ2 conflicts with the strategic intent of the Development Boundary and is not supported by appropriate evidence. It does not meet the Basic Conditions.

- **M21 – Delete Policy EJ2**

124. **Policy EJ3** – This retains existing employment land and allocates a new site for employment related development consequent on an alteration in the Development Boundary.

125. The two limbs of the Policy serve distinctly different purposes and I recommend they are provided as separate policies.

126. The first part of Policy EJ3 is not supported by evidence as to the particular significance of an existing employment site on King Street/Duke Street. This will in any case fall within the ambit of the general policy for retaining existing employment land. It is notable that the King Street/Duke Street employment area is not included on the Local Plan policies map for Broseley and the boundaries of all the existing employment areas shown on the Plan's Policies map are different to those on the Local Plan policies map. I am content with the addition of the land on Kings Street/Duke Street but no evidence has been provided to amend the boundaries shown in in the Local Plan policies map. This should be clarified by referencing a map of the existing employment areas consistent with the Local Plan as part of the addition of the King Street/Duke Street site.

127. The Policy's support for "*more effective use*" of existing employment sites is unclear and it is not addressed in the supporting text.

128. The second part of Policy EJ3 allocates a new site for employment use consequent on an adjustment to the Development Boundary. I have separately recommended that the Development Boundary is addressed in a separate policy, supported by appropriate maps showing the changes and a justification. The proposed site is adjacent to an existing employment site which was extended through a planning consent in 2019.

129. There is an inconsistency in the proposed location of the new Development Boundary. This is shown differently in the Plan's Policies Map and the map in Appendix 6 where it runs down the entire western edge of the site such that Green Space 5a lies outside it. I sought clarification on this difference and Broseley Town Council acknowledges an error in the Policies Map and that the intention is for Green Space 5a to be outside the Development Boundary.

130. The strategic planning context is provided by the emerging Local Plan that provides for an additional 3ha employment land in Broseley, to be delivered through *“any employment development allocated within the Broseley Neighbourhood Plan”* (Policy S4.1) among other sources. Appendix 6 of the Plan incorrectly identifies this as being between 2006-2036. This should read 2016-2038. The relationship between the Local Plan and the neighbourhood plan is both positive and appropriate. The proposed allocation responds to a specific request from the business occupying adjacent land and owning the site with certainty over future expansion. It also reflects wider public support for local employers evident in the public consultation.

131. Appendix 6 states that the proposed allocation provides either an additional 0.74 ha or an additional 1.70 acres. 0.74 ha equates to 1.83 acres and 1.70 acres to 0.69 ha. These are not insignificant differences and the area of the proposed allocation should be clarified and used consistently.

132. I visited the site and it provides an appropriate location. There is a strong relationship to the existing employment land which is under the same ownership. The landowner is supportive of the proposed allocation. The site includes important water features and is adjacent to Stocking Mound, an important heritage asset related to the area’s mining history and included on Shropshire’s Historic Environment Record. The Policy seeks to take account of these and other planning considerations by referencing *“site allocation restrictions”* in an Annex. The criteria relate to the site’s development rather than being restrictions. They are broadly appropriate although they fail to include the expected access to the site and include a cryptic reference to “SC” and further clarity would be provided by including them under a separate heading, as for the residential site allocation in Appendix 5.

133. Policy EJ3 does not meet the Basic Conditions.

- **M22- Replace Policy EJ3 with “Existing employment land shown in Map ? will be retained in employment use where possible and development proposals which maintain or enhance existing employment use will be supported.”**

- **M23 – Insert a new Policy “Land off Cockshutt Lane is allocated for employment use [see Figure ?]. Development proposals for this site should have regard to the criteria in Appendix 6.”**
- **M24 – In Appendix 6:**
 - Replace “2006- 2036” with “2016-2038” in the first line
 - Replace sub heading “*New Boundary*” with “Site Development Criteria and:
 - Add “meet all the following criteria:” after “*Proposals for development of this site*” and move this to after the second paragraph
 - Replace the third paragraph with “1) Access will be via the existing access point off Cockshutt Lane”
 - Replace the first criterion with “All development proposals should be accompanied by appropriate assessments of their impact on heritage, wildlife and trees”
 - Renumber the remaining criteria
 - Clarify the area of the proposed allocation and use consistently throughout the Plan
 - Replace all references to “SC” with “Shropshire Council
 - Make other changes consequent on the recommended Modifications,
- **M25 – Amend the Policies Map to depict the Development Boundary as shown in Appendix 6**

134. **Policy EJ4** – This supports appropriate proposals for new retail floor space in the Primary Shopping Area.

135. The Policy is positively worded and supported by an unreferenced map showing the location of each “*Designated Retail Area*”. On seeking clarification I was informed that these are the same as the Primary Shopping Areas referenced in the Policy. The Local Plan identifies a single Primary Shopping Area which falls almost entirely within the designated

Broseley Town Centre. The other shopping areas identified in the Plan are not recognised in the Local Plan.

136. On visiting each location I am satisfied that it is appropriate for them all to be recognised in the Plan. To avoid confusion with the Local Plan it is appropriate for the Plan to identify them as “Retail Areas” and the Policy and supporting map should be amended appropriately.

137. Policy EJ4 does not meet the Basic Conditions.

- **M26 – Amend Policy EJ4 to replace “*the Primary Shopping Area*” with “a Retail Area (see Map ?)”**

138. **Policy EJ5** – This supports proposals for home working and home-run businesses subject to their impact on local amenity.

139. Policy EJ5 meets the Basic Conditions.

140. **Policy EJ6** – This supports conversion of existing buildings for business where it does not have a significant impact.

141. The Policy is consistent with the Plan’s support for creating new economic opportunities. Policy EJ6 meets the Basic Conditions.

Green spaces and green infrastructure, sport and recreation

142. This section of the Plan relates only to green spaces and green infrastructure and should be retitled accordingly consistent with other recommended modifications to the Plan’s structure. The Plan does not include any policies directly to deliver its objectives relating to sport and recreation.

143. **Policies GR1 and GR2** – These protect 11 areas of “*valued green space*” identified in the Broseley Town Plan and identify 5 additional areas of valued green space for the same protection.

144. The evidence supporting these designations is a reference to the Town Plan, a map showing the location of each green space and an Appendix which scores each of the areas against five criteria (Existing designation, Public Access, Heritage Value, Environmental Value, Visual Amenity). There is also evidence of strong public support for recognising and protecting green space and the additional areas were included as a result of public consultation conducted when preparing the Plan. A representation to the Plan noted that not all the proposed green spaces have public access. Public access is not a requirement for designation provided that there are other public benefits provided by the green space. Each green space had to achieve a minimum score to be included. None of the areas included in the analysis failed to meet this standard. I was informed that three locations had been assessed for designation but not taken forward as they failed to meet the standard.

145. I visited each of the 16 green spaces and, with exceptions, I concur with the assessment provided in Appendix 3. The most suitable boundary for GS6, GS10 and GS11 could be the subject of debate. GS7 is designated on grounds of its recreational value for sport but also includes a significant area of woodland. GS8 is described as having open views across the “*east*” Midlands rather than the West Midlands. GS3 is designated on the grounds that it is of high environmental value without supporting evidence and some additional information was provided on request.

146. Most significantly GS15 is not included in the Plan’s map and so its location has not been subjected to public consultation on the submitted Plan. I was informed that the boundary was included on a map placed in the public library but this would not have been known to a majority of those who engaged with the Plan. A verbal description of the location of GS15 is not sufficient and it cannot be included in the Plan.

147. On request I was provided with some further information supporting designation and detailed boundary maps for each Green Space. These should be available in the final

Plan. I was also informed that a significant part of GS1 has been consented for development and the boundary should be amended to exclude the area permitted for development. I am also content with the more minor changes to the boundary of GS3.

148. The numbering of the green spaces is unhelpful. GS5a is distinct from GS5 and they should be number sequentially. The larger scale maps also confirm the merit in separating GS6 into two and these should also be differently numbered. It would also be helpful to provide short names for those green spaces which do not have them

149. On request Broseley Town Council confirmed consultation had taken place with landowners and that it had met or spoken to the main landowners as part of the consultation process and involved other landowners in a survey in 2019.

150. The Plan's approach to "Valued Green Spaces" aligns with the expectations of national planning policy for designating "Local Green Spaces" and I note this is the approach taken by the Broseley Town Plan on which a majority of the proposals are based. The distinction is an important one because of the added protection afforded designated Local Green Space. On request an updated Basic Conditions Statement was provided that confirmed that *"the term, 'Valued Green Space' is synonymous with the NPPF term 'local green space'. The phrase 'valued green space' has been used in the Plan because this term was used in the predecessor Town Plan and therefore has a local resonance"*. I respect the intention to secure maximum public recognition of these green spaces but recommend the Plan aligns with the terminology of national planning policy. This is to ensure maximum clarity over the high level of protection afforded by the designation.

151. To be afforded a level of protection consistent with them being Green Belt Local Green Spaces need only by designated by the Plan. This follows a Court of Appeal case with relating to a Local Green Space policy in a neighbourhood plan (*Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council*, [2020] EWCA Civ 1259) which means it is inappropriate to include any wording that sets out how development proposals should be managed.

152. Policies GR1 and GR2 do not meet the Basic Conditions.

- **M27 – Replace Policies GR1 and GR2 with “The following areas are designated as Local Green Space (see Map?):**
 - **GS1 – Land north of Balls Lane.....etc**
- **M28 – Delete GS15 in the World Heritage Site on the edge of the neighbourhood area from the Plan**
- M29– Include the updated and detailed boundary maps for each Local Green Space provided for the Examination in addition to a single map depicting them all
- OM3 – [Provide brief names for each Local Green Space which does not have one and correct the description of open views for GS8 to the West Midlands]

153. **Policy GR3** – This addresses the importance of formal and informal open space when considering development proposals.

154. The Policy is broad in its approach and will require an assessment of the importance of particular open spaces to be made on a case by case basis. It is unduly restrictive in stating what will “*only*” be supported and removing support from development with only a minor adverse impact.

155. Policy GR3 does not meet the Basic Conditions.

- **M30 – Amend Policy GR3 to:**
 - **Delete “*only*”**
 - **Replace “*adversely affect*” with “have a significant adverse impact on”**

156. **Policy GR4** – This encourages development which creates wider accessibility to the local footpath network, which closes gaps and which improves existing provision.

157. The Policy is not supported by evidence of the location of the footpath network or where gaps and priorities for improving existing provision exist. On request I was provided with a map of the existing footpath and bridleway network and recommend this is included in the Plan. National planning policy supports policies to “*protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks*” (paragraph 100, NPPF). This approach is more precise in defining the network and addressing other users such as horse riders and cyclists on bridleways.

158. Policy GR4 does not meet the Basic Conditions.

- **M31 – Amend Policy GR4 to replace “*footpath*” with “*rights of way*”**
- OM4 – [Include a map and/or link to the existing rights of way network in the neighbourhood area]

159. **Policy GR5** – This identifies a series of five “green routes” to be protected and to benefit recreation and tourism.

160. The Policy is not supported by evidence supporting the designation of the five “green routes” and no information on their location beyond a brief written description is provided. I was informed this could be provided on a map. It is unclear whether these routes use existing rights of way. Policies GR4 and GR5 are inconsistent in their approach with the former limited to footpaths and the latter including bridleways. A common approach to public rights of way should be used.

161. The Policy includes a statement of the Plan’s intentions for creating a “*walking culture*”, improving links to the World Heritage site and encouraging development of a permissive path network. This is best located in the supporting text.

162. Policy GR5 does not meet the Basic Conditions.

- **M32 – Amend Policy GR5 to replace the first three sentences with:**
“Public rights of way through green spaces in Broseley will be protected and, where possible enhanced. Development proposals will be supported which improve the network, including through the provision of permissive paths and the delivery of green routes in the following locations (see Map?):”
- OM5 – [Provide a map showing the location of the five green routes]

163. **Policy GR6** – This supports protection and improvement of the area’s green infrastructure of trees, hedgerows and woodland.

164. The Policy requires only minor drafting changes to meet the Basic Conditions.

- **M33 – Amend Policy GR6 to replace “*will be expected to*” with “*should*”**

165. **Policy GR7** – This states that the Town Council will work with landowners to identify a space for allotments close to the town centre.

166. As drafted the Policy is a statement of intent and not a planning policy relating to the determination of a planning application. It is appropriate for it to be included in the supporting text. The Policy should relate to planning considerations and the supporting text should also reference the location of the Town Centre as designated in the existing Local Plan and consider identifying the boundary on a map.

167. Policy GR7 does not meet the Basic Conditions.

- **M34 – Replace Policy GR7 with “Proposals for allotments close to the town centre will be supported.”**

- M35 – Provide details of the location of the Town Centre as designated in the Local Plan in the supporting text

Conservation, Heritage, Landscape and the Environment

168. **Policy CH1** – This seeks development in the Conservation Area that is consistent with the Broseley Design Statement and Conservation Area Appraisal.

169. Policy CH1 does not address any issues not already included in recommended Policy D1. It is restricted to development in Conservation Areas and appropriate consideration of the Town Plan and any relevant Conservation Area Appraisal is provided by the recommended modifications to the Design section of the Plan. This also addresses the lack of clarity about what constitutes the Broseley Design Statement. Retaining Policy CH1 duplicates another Plan policy and reduces the Plan’s clarity.

170. Policy CH1 does not meet the Basic Conditions.

- **M36 – Delete Policy CH1**

171. **Policy CH2** – This supports development with a positive impact on the countryside surrounding Broseley.

172. The Policy is positively worded and meets the Basic Conditions. Policy CH2 contributes to the Green Spaces and Green Infrastructure Objective 5.4b) and should be relocated into this section of the Plan.

- **M37 - Relocate Policy CH2 into the Green Spaces and Green Infrastructure section as a GR policy**

173. As a consequence of these changes the section on “*Conservation, Heritage, Landscape and the Environment*” should be deleted as recommended in modifications to the Plan’s structure.

Community Resources

174. **Policy CR1** – This supports development resulting in the loss of community resources subject to specific criteria.

175. The Policy is supported by examples of community resources in the neighbourhood area. Limited detail is provided and it is a non-exhaustive list.

176. National and strategic planning policy is to protect existing facilities and support new ones that make a positive contribution. Policy CR1 takes a different approach that supports the loss of facilities unless specific criteria are met. This is not consistent with Local Plan policies CS8 and CS15, national planning policy (paragraph 93, NPPF) or the Plan's own objective *"to secure and retain community facilities"*.

177. Policy CR1 does not meet the Basic Conditions.

- **M38 – Replace Policy CR1 with:**

"Development proposals that would result in the loss of community resources and facilities in Broseley should demonstrate that:

- a) The community resources and facilities are no longer required; or either**
- b) That alternative appropriate provision exists or will be provided elsewhere in the community to serve local people; or**
- c) Suitable alternative resources and facilities are included in the proposal."**

178. **Policy CR2** – This supports new or improved community facilities subject to criteria relating to their impact on the local area.

179. Policy CR2 meets the Basic Conditions

Supporting the visitor economy, tourism and leisure

180. This section should be retitled "Supporting the Visitor Economy" as recommended in the modifications to the structure of the Plan. This aligns it with the Plan's objectives.

181. The policies are supported by evidence of visitors choosing to stay overnight in other locations despite Broseley's location near to Ironbridge Gorge. As a result the Plan supports an approach which supports tourist-related development and protects Broseley's rural character.

182. **Policy VE1** – This supports tourist related development that enhances an existing business, brings positive conservation benefits and does not harm neighbouring residential areas. It adopts the same approach whether or not the development proposal is within the Development Boundary.

183. The effect of the Policy is dependent on whether all of the criteria must be met. Given the Plan's objective to support tourist related development while protecting its rural character I have understood the Policy intention to be for any one of the criteria to be met. This was confirmed by Broseley Town Council. The Policy's approach could support significant development and I therefore recommend that the Plan's intention to protect the countryside around Broseley is directly addressed.

184. Policy VE1 does not meet the Basic Conditions.

- **M39 – Amend Policy VE1 to:**
 - **Delete *areas***
 - **Replace "*subject to*" with "**when**"**
 - **Insert "**or**" at end of b)**
 - **Replace "*an*" with "**a significant**" in c)**
 - **Insert "**or the quality and visual appearance of the countryside around Broseley**" at end of c)**

185. **Policy VE2** – This supports proposals for holiday accommodation that satisfy existing Local Plan policies.

186. The Policy duplicates existing development plan policy which will be used to determine any planning application for holiday accommodation in the neighbourhood area.

The specific Local Plan policies will also be replaced shortly given the advanced review of the Shropshire Local Plan, subject to the outcome of the current Examination in Public, resulting in the Policy becoming superseded.

187. Policy VE2 does not meet the Basic Conditions.

- **M40 – Delete Policy VE2**

188. **Policy VE3** – This does not support development adversely affecting the character of the countryside between Broseley and the Ironbridge Gorge World Heritage Site.

189. The Policy is not supported by evidence defining the location of the countryside where it will be relevant and Broseley Town Council confirmed this area has not been defined. There is no evidence provided of what contributes to this countryside's *“unspoilt character”*. This reduces its clarity. The Policy is negatively worded and would not support development with only a minor impact.

190. Policy VE3 does not meet the Basic Conditions.

- **M41 – Replace Policy VE3 with:**
“Development proposals should avoid any significant adverse impact on the character of the countryside between the Broseley Development Boundary and the Ironbridge Gorge World Heritage Site.”

191. **Policy VE4** – This seeks to protect and enhance defined areas used for outdoor recreation, sport and leisure.

192. The areas to be protected and enhanced do not appear on the Policies Map as indicated and as a result the Policy lacks both clarity as to where it applies and an evidence base justifying the approach. On request I was informed this was an omission and the areas are *“Birchmeadow Fields, Cricket Club site, MUGA and Guest Road play-space”*.

193. Policy VE4 does not meet the Basic Conditions.

- **M42 – Replace Policy VE4 with “The following areas used for outdoor recreation, walking, sport and recreation identified on the Policies Map will be protected and where possible enhanced:**
 - **Birchmeadow Fields;**
 - **Cricket Club site;**
 - **Multi-use Games Area; and**
 - **Guest Road play-space.”**

Achieving sustainable development and responding to the challenge of climate change

194. **Policy SD1** – This seeks development which achieves high standards of energy efficiency and proposals to be supported by a statement showing how they will achieve this.

195. The Policy is consistent with national and strategic policy to improve energy efficiency and renewable energy provision. The Policy lacks clarity as to what constitutes “a high standard” of energy efficiency although I was informed by Broseley Town Council “EPC grade 'A' is one definition. We opted not to define this in the NP, because we wished to retain some flexibility in anticipation of emerging changes to national standards and recommendations”. It is also unclear what is meant by “a high and sustainable level of design and construction”. It is unduly onerous in requiring every planning application to be accompanied by a statement as to how it will set high standards of energy efficiency and sustainability regardless of the scale of development or its significance. It should be clear that all the issues identified for being included in the accompanying statement should be provided only where relevant.

196. The scope of the Policy overlaps with other provisions, including Building Regulations. These address the thermal efficiency of building materials and compliance with construction and other standards. The drafting should be more consistent with other policies.

197. Policy SD1 does not meet the Basic Conditions.

- **M43 – Replace Policy SD1 with:**

“Development proposals should be designed to be energy efficient and sustainable. Relevant planning applications should include a statement setting out how the development will achieve this, including as appropriate:

- **Siting and orientation to optimise passive solar gain;**
- **The use of energy efficient measures such as loft and wall insulation and double glazing; and**
- **The incorporation of on-site energy generation from renewable sources.”**

198. **Policy SD2** – This seeks development involving existing buildings to be designed to reduce energy use and meet other standards, including the expectations of Policy SD1.

199. The Policy is less clearly drafted than Policy SD1 and duplicates its provision. Policy SD1 covers all development associated with existing buildings and compliance with other standards is not a matter of planning policy.

200. Policy SD2 does not meet the Basic Conditions.

- **M44 – Delete Policy SD2**

201. **Policy SD3** – This supports measures to reduce energy demand and generate renewable energy in heritage buildings providing it safeguards their historic character and for this to be done with the involvement of relevant organisations.

202. The main policy consideration is largely addressed by Policy D1 although there is some merit in explicitly addressing the desired approach to such energy measures in historic buildings. In the absence of a definition of “*heritage properties*” the clarity of the Policy will be improved by addressing “*heritage assets*” which are defined in national planning policy and which also addresses their significance as well as character.

203. The need for development to be *“carried out with the active engagement with and permission of the relevant organisations”* is unclearly drafted, ambiguous as to which organisations are relevant and not an appropriate planning consideration.

204. Policy SD3 does not meet the Basic Conditions.

- **M45 – Amend Policy SD3 to:**
 - Replace *“heritage properties”* with *“heritage assets”*
 - Replace *“building”* with *“asset”*
 - Delete from *“and the development”* to the end

205. **Policy SD4** – This states that non-residential development should aim for BREEAM Excellent.

206. National planning policy is that *“any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”* (NPPF, paragraph 154) and the Plan can support but not require development to deliver higher voluntary standards. BREEAM Excellent is also an onerous expectation to place on small scale non-residential developments.

207. Policy SD4 does not meet the Basic Conditions.

- **M46 - Replace Policy SD4 with:**
“Non-residential development meeting the Building Research Establishment (BREEAM) “excellent” standard will be supported.”

Water Infrastructure

208. **Policy WA1** – This requires development to demonstrate adequate provision is made for water, foul drainage, wastewater and sewerage, including where phasing is required or capacity improvements are provided via agreement.

209. The Policy is a response to the need identified in the Appropriate Assessment for mitigation against unacceptable impacts on the Severn Estuary European Marine Site. It will be helpful to explain this context in the supporting text.

210. I note that the Environment Agency has “*no concerns*” with the Policy and that Severn Trent Water raises no issues in its represent

211. The infrastructure addressed by the Policy is being considered as part of the Local Plan review which is at Examination. The Plan is proceeding ahead of the Local Plan review and it is necessary, therefore, for it to include appropriate mitigations. Planning Practice Guidance is supportive of neighbourhood plans addressing infrastructure (Paragraph: 045 Reference ID: 41-045-20190509). I agree with Shropshire Council’s view, provided on request, that it “*considers that draft Policy WA1 is a non-strategic policy*”.

212. As a result of its preparation late in the preparation of the Plan Policy WA1 is located in a separate section of the Plan. It is more logical for it to be included within the previous section as a SD policy related to sustainable development.

213. Policy WA1 meets the Basic Conditions.

- OM6 – [Move Policy WA1 into the Sustainable Development section of the Plan as a SD policy and provide an explanation in the supporting text of its role as a mitigation measure identified in the Appropriate Assessment.]

8. Recommendation and Referendum Area

214. I am satisfied the Broseley Neighbourhood Plan meets the Basic Conditions and other requirements subject to the modifications recommended in this report and that it can proceed to a referendum. I have received no information to suggest other than that I recommend the referendum area matches that of the Neighbourhood Area.

Section	Necessary Modification	Optional Modification	Agreed (Y/N)
Page 5 – Town Council Boundary	M1 – Confirm in the supporting text and/or legend that the Town Council Boundary and neighbourhood area are the same and provide a link to where the boundary can be viewed at a larger scale		Y
Throughout	M2 – Clearly differentiate the Plan’s policies from the supporting text (such as by using tinted boxes) and be consistent in the format of the identifying co		Y
Throughout	M3 – Amend the Plan to provide a consistent approach to the structure, hierarchy and paragraph numbering and use consistent headings		Y
Throughout	M4 – Amend the Plan to provide greater clarity in the use and presentation of maps reflecting the feedback provided in this report		Y
Throughout		OM1 – [Be consistent in the use of supporting data throughout the Plan]	Y
Evidence base		OM2 – [List all the evidence base documents used in the Plan in an Appendix along with links where available and consider providing a section of the Town Council’s website which brings together all the documents in the Plan’s evidence base into a single location]	Y
Design Policies	M5 – Retitle this section as “Design” and delete references to the Design Statement in the policies and supporting text while retaining relevant content. Provide links to the Town Plan and relevant Conservation Area appraisal as supporting evidence for the design principles		Y
Policies A1 and DS1-DS10	M6 – Replaces Policy A1 and DS.1 to DS.10 with: “Policy D1		Y

	<p>Development proposals that demonstrate due regard to the following design principles will be supported:</p> <p>a) Be in keeping with the form and materials that define the town's heritage</p> <p>b) Be of a design and use material that respects local character with regard to:</p> <p>a. Floor area, roof pitch and roof height;</p> <p>b. Size of windows and facades; and</p> <p>c. Style and colour of brickwork and roof tiles as appropriate</p> <p>c) Where possible retain existing walls and hedges and provide boundary walls on street frontages and hedges elsewhere</p> <p>d) Incorporate the use of locally distinctive brick and/or stone headers and decorative corbels, cornices and patterned/alternating brickwork on frontages</p> <p>e) Minimise light pollution and have regard to appropriate Institution of Lighting Engineers' guidance</p> <p>f) Provide innovative high quality approaches to meeting the design principles on individual plots</p> <p>g) Incorporate the use of street furniture using materials, colour and designs that respect local character, including existing street furniture that is retained. "</p>		
Policy HO1	<p>M7 – Amend Policy HO1 to:</p> <ul style="list-style-type: none"> ○ Replace the first sentence with "New housing development in Broseley will be supported on windfall sites within the Broseley Development Boundary [ref Proposals Map]." ○ Replace c) with "maintain Broseley's Local Green Spaces [ref Proposals Map]; and ○ Replace notation i) to iv) with a) to d) ○ Replace "<i>will be supported provided proposals</i>" with "should" ○ Insert "or" at end of subsection iii: ○ End the Policy with a full stop 		Y

Policy HO1	M8 – Reference the definition of the existing Development Boundary in the adopted Shropshire Site Allocations and Management of Development (SAMDev) Plan (2006-2026) in the supporting text.		Y
Policy HO2	M9 - Replace Policy HO2 with “Land off Avenue Road is allocated for housing development with an indicative capacity for 20 dwellings [see Figure ?]. Development proposals for this site should have regard to the criteria in Appendix 5.”		Y
Policy HO2	M10 – Provide supporting text to Policy HO2 which explains the planning considerations that support an intended capacity for 20 dwellings		Y
Policy HO2	M11 – Amend Appendix 5 to: <ul style="list-style-type: none"> ○ Provide a large scale map depicting the boundary of the site allocation ○ Replace “<i>Site Allocation Criteria</i>” with “Site Development Criteria” and insert “all” after “meet” in the first line of this subsection ○ Add an additional criterion “Development to provide around 20 homes” ○ Add an additional criterion “Development to be informed by an assessment of any coal mining legacy risk” ○ Delete “See next page” 		Y
Policy HO2	M12 – Insert a new Policy at the beginning or end of the Policies section “Policy DB1 The Development Boundary for Broseley is as provided in Figure?”		Y
Policy HO2	M13 – Provide supporting text to Policy DB1 which explains and justifies the amendment to the Development Boundary in two locations, including maps of sufficient scale showing the new boundary and the two proposed changes		Y
Policy HO3	M14 – Delete Policy HO3		Y
Policy HO4	M15 – Delete Policy HO4 and Appendix Four		Y
Policy HO5	M16 – Delete Policy HO5		Y

Policy HO6	M17 – Delete Policy HO6		Y
Policy HO7	M18 – Amend Policy HO7 to: <ul style="list-style-type: none"> ○ Delete <i>“only”</i> in the first line ○ Replace <i>“provides benefit”</i> with <i>“preserves or enhances”</i> in a) ○ Replace <i>“an infill”</i> with <i>“a”</i> in b) <p>Insert <i>“, where appropriate,”</i> before <i>“is able”</i> in c)</p> <ul style="list-style-type: none"> ○ Add <i>“and”</i> after <i>“;”</i> at the end of c) ○ Insert <i>“significant”</i> before <i>“negative”</i> and delete <i>“and/or on overall density of provision”</i> in d) 		Y
Policy HO7 Explanation	M19 – Replace <i>“adopted”</i> with <i>“draft”</i> in line 3 of paragraph 8.11		Y
Policy EJ 1	M20 - Amend Policy E J1 to: <ul style="list-style-type: none"> ○ Replace <i>“B and D”</i> with <i>“B2, B8, E, F1 and F2”</i> ○ Replace <i>“have a positive”</i> with <i>“not have a significant adverse”</i> in a) <p>Insert <i>“a significant adverse”</i> before <i>“unacceptable”</i> in b)</p> <ul style="list-style-type: none"> ○ Replace <i>“has a positive”</i> with <i>“does not have a significant adverse”</i> in e0 ○ Insert <i>“and”</i> after <i>“;”</i> at end of e) ○ Replace <i>“;”</i> with a full stop at end of f) ○ Make g) a freestanding limb of the Policy ○ Delete <i>“only”</i> and insert <i>“for a reasonable period of time”</i> after <i>“price”</i> in the former g) 		Y
Policy EJ2	M21 – Delete Policy EJ2		Y
Policy EJ3	M22- Replace Policy EJ3 with “Existing employment land shown in Map ? will be retained in employment use where possible and development proposals which maintain or enhance existing employment use will be supported”		Y

Policy EJ3	M23 – Insert a new Policy “Land off Cockshutt Lane is allocated for employment use [see Figure ?]. Development proposals for this site should have regard to the criteria in Appendix 6.”		Y
Appendix 6	<p>M24 – In Appendix 6:</p> <ul style="list-style-type: none"> ○ Replace “2036” with “2038” in the first line ○ Replace sub heading “<i>New Boundary</i>” with “Site Development Criteria and: <ul style="list-style-type: none"> ▪ Add “meet all the following criteria:” after “<i>Proposals for development of this site</i>” and move this to after the second paragraph ▪ Replace the third paragraph with “1) Access will be via the existing access point off Cockshutt Lane” ▪ Replace the first criterion with “All development proposals should be accompanied by appropriate assessments of their impact on heritage, wildlife and trees” ▪ Renumber the remaining criteria ○ Clarify the area of the proposed allocation and use consistently throughout the Plan ○ Replace all references to “SC” with “Shropshire Council ○ Make other changes consequent on the recommended Modifications 		Y
Policies Map	M25 – Amend the Policies Map to depict the Development Boundary as shown in Appendix 6		Y
Policy EJ4	M26 – Amend Policy EJ4 to replace “<i>the Primary Shopping Area</i>” with “a Retail Area (see Map ?)		Y
Policies GR1 and GR2	<p>M27 – Replace Policies GR1 and GR2 with “The following areas are designated as Local Green Space (see Map?):</p> <ul style="list-style-type: none"> ○ GS1 – Land north of Balls Lane.....etc 		Y

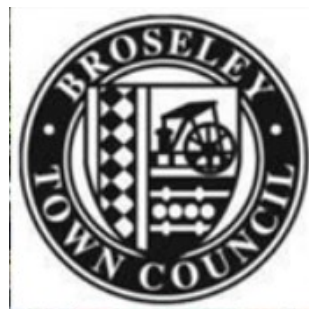
GS15	M28 – Delete GS15 in the World Heritage Site on the edge of the neighbourhood area from the Plan		Y
Local Green Space mapping	M29– Include the updated and detailed boundary maps for each Local Green Space provided for the Examination in addition to a single map depicting them all		Y
		OM3 – [Provide brief names for each Local Green Space which does not have one and correct the description of open views for GS8 to the West Midlands	Y
Policy GR3	M30 – Amend Policy GR3 to: <ul style="list-style-type: none"> ○ Delete <i>“only”</i> ○ Replace <i>“adversely affect”</i> with <i>“have a significant adverse impact on”</i> 		Y
Policy GR4	M31 – Amend Policy GR4 to replace <i>“footpath”</i> with <i>“rights of way”</i>		Y
		OM4 – [Include a map and/or link to the existing rights of way network in the neighbourhood area]	Y
Policy GR5	M32 – Amend Policy GR5 to replace the first three sentences with: <i>“Public rights of way through green spaces in Broseley will be protected and, where possible enhanced. Development proposals will be supported which improve the network, including through the provision of permissive paths and the delivery of green routes in the following locations (see Map?):”</i>		Y
		OM5 – [Provide a map showing the location of the five green routes]	Y
Policy GR6	M33 – Amend Policy GR6 to replace <i>“will be expected to”</i> with <i>“should”</i>		Y

Policy GR7	M34 – Replace Policy GR7 with “Proposals for allotments close to the town centre will be supported”		Y
	M35 – Provide details of the location of the Town Centre as designated in the Local Plan in the supporting text		Y
Policy CH1	M36 – Delete Policy CH1		Y
Policy CH2	M37 - Relocate Policy CH2 into the Green Spaces and Green Infrastructure section as a GR policy		Y
Policy CR1	M38 – Replace Policy CR1 with: “Development proposals that would result in the loss of community resources and facilities in Broseley should demonstrate that: a) The community resources and facilities are no longer required; or either b) That alternative appropriate provision exists or will be provided elsewhere in the community to serve local people; or c) Suitable alternative resources and facilities are included in the proposal”		Y
Policy VE1	M39 – Amend Policy VE1 to: <ul style="list-style-type: none"> ○ Delete <i>areas</i>” ○ Replace “<i>subject to</i>” with “when” ○ Insert “or” at end of b) ○ Replace “<i>an</i>” with “a significant” in c) ○ Insert “or the quality and visual appearance of the countryside around Broseley” at end of c) 		Y
Policy VE2	M40 – Delete Policy VE2		Y
Policy VE3	M41 – Replace Policy VE3 with: “Development proposals should avoid any significant adverse impact on the character of the countryside between the Broseley Development Boundary and the Ironbridge Gorge World Heritage Site”		Y

Policy VE4	<p>M42 – Replace Policy VE4 with “The following areas used for outdoor recreation, walking, sport and recreation identified on the Policies Map will be protected and where possible enhanced:</p> <ul style="list-style-type: none"> ○ Birchmeadow Fields; ○ Cricket Club site; ○ Multi-use Games Area; and ○ Guest Road play-space” 		Y
Policy SD1	<p>M43 – Replace Policy SD1 with:</p> <p>“New development proposals should be designed to be energy efficient and sustainable. Relevant planning applications should include a statement setting out how the development will achieve this, including as appropriate:</p> <ul style="list-style-type: none"> ○ Siting and orientation to optimise passive solar gain, and ○ The use of energy efficient measures such as loft and wall insulation and double glazing; and ○ The incorporation of on-site energy generation from renewable sources.” 		Y
Policy SD2	M44 – Delete Policy SD2		Y
Policy SD3	<p>M45 – Amend Policy SD3 to:</p> <ul style="list-style-type: none"> ○ Replace “<i>heritage properties</i>” with “heritage assets” ○ Replace “<i>building</i>” with “asset” ○ Delete from “<i>and the development</i>” to the end 		Y
Policy SD4	M46 - Replace Policy SD4 with: <p>“Non-residential development meeting the Building Research Establishment (BREEAM) “excellent” standard will be supported”</p>		Y
Policy WA1		OM6 – [Move Policy WA1 into the Sustainable Development section of the Plan as a SD policy and	Y

		provide an explanation in the supporting text of its role as a mitigation measure identified in the Appropriate Assessment.]	
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BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

POST EXAMINATION VERSION FOR REFERENDUM



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

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1. Foreword

Broseley Town Council took the decision to create a Neighbourhood Plan in April 2018. The Council considers that this plan is vital to ensure that future development in the town meets the needs of the community and preserves Broseley's unique identity.

During the production this Plan, which took longer than envisaged as a result of the Covid pandemic in 2020-21, contributions have been sought from numerous organisations and individuals, within the town and beyond, through focus and working groups, and two major public consultation exercises took place to seek the views of all residents. We therefore believe that this plan encapsulates the aspirations of the community as a whole for the future of our town.

On behalf of Broseley Town Council, I pay tribute to all the people who have worked so hard to create this Plan. In particular, sincere thanks are due to Phil Revell, who chaired the Neighbourhood Plan Advisory Group and has steered this Plan from birth to completion. We also wish to thank Shropshire Council's planning officers, who have provided invaluable expert guidance, and to our Planning Consultant, Michael Barker.

Cllr Ian West
Broseley Town Mayor 2022-2023

2. Introduction

- 2.1. A Neighbourhood Plan is a way of helping local communities to influence the planning of the area in which they live and work. A Neighbourhood Plan is an important and powerful planning document that has statutory weight and must be taken into account as a material consideration in planning decision making.
- 2.2. It can be used to:
 - a) Develop a shared vision for a neighbourhood;
 - b) Guide where new homes, shops, offices and other development should be built;
 - c) Identify and protect important local green spaces;
 - d) Influence what new buildings should look like.
- 2.3. Neighbourhood Plans arose out of 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.
- 2.4. The Broseley Neighbourhood Plan covers the whole of the administrative area of Broseley Town Council, which includes Broseley, Broseley Wood, Jackfield and the surrounding countryside (see Figure 2). The Plan has been prepared to make sure that Broseley has an established long-term view for the local community's aspirations for development through to 2038.
- 2.5. When the Broseley Neighbourhood Plan is 'made' it will become part of the Shropshire Local Development Framework. The Neighbourhood Plan will be used to help determine planning applications within the Broseley designated Neighbourhood Area.
- 2.6. The Broseley Neighbourhood Plan has been produced following a resolution by the Town Council at a meeting on 10th. April 2018. On 19th. April 2018 the Town Council submitted an application to Shropshire Council to designate the Neighbourhood Plan Area. On 17th. September 2018 Shropshire Council approved the application to designate the Neighbourhood Plan Area and approve the Town Council as the qualifying body to prepare the Plan.
- 2.7. This Neighbourhood Plan has been prepared following extensive consultation (see the Consultation Statement) with the residents of Broseley, interested parties, businesses and landowners. Shropshire Planning Department has been consulted throughout the process and has provided essential information and advice. Neighbouring Councils and Statutory Bodies have also been consulted. The Plan is comprised of several sections: the main Plan and policies, a Basic Conditions Statement, and a Consultation Statement. The latter two statements are produced as separate documents.

The National Planning Policy Framework and Shropshire Context

- 2.8. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. Within that national framework local authorities like Shropshire prepare development plans for their area.
- 2.9. At the time of preparing this Neighbourhood Plan the relevant Shropshire development plan is the Shropshire Core Strategy alongside the Site Allocations and Development Policies

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Development Plan (SAMDev). Taken together these two documents make up the Shropshire Local Plan.

- 2.10. The Core Strategy sets out Shropshire Council's vision, strategic objectives and the broad strategy to guide future development and growth in Shropshire during the period up to 2026. The Core Strategy was adopted in February 2011.
- 2.11. Shropshire's Site Allocations and Development Policies Development Plan (SAMDev) was adopted in December 2015 and sets out proposals for the use of land and policies to guide future development in order to help deliver the vision and objectives of the Shropshire Core Strategy for the period up to 2026.
- 2.12. A partial review of the Shropshire Local Plan (2016 – 2038) is currently underway. The purpose of this review is to update elements of the Plan and to make sure that Shropshire can respond flexibly to changing circumstances in line with the NPPF. The Review will include the consideration of housing numbers (including objectively assessed need), employment land requirements, the distribution of development and a review of Green Belt boundaries as part of the consideration of strategic options to deliver new development.
- 2.13. Any relevant changes necessitated by an updated Shropshire Local Plan will be considered by Broseley Town Council when the Neighbourhood Plan is reviewed.

Broseley – an early industrial town



- 2.14. Broseley is a small town in Shropshire. Broseley has a town council and is part of the area controlled by the Shropshire unitary authority. The River Severn flows to the north and east of the town. Jackfield lies on the southern bank of the River Severn, and is a split community, with part of the settlement controlled by Telford and Wrekin Council.
- 2.15. Broseley is a semi-rural settlement. It is bounded by open fields to the east and south. The western boundary is marked by the Benthall Valley that leads down to Ironbridge. A north/south ridge to the west of the town encompasses the Broseley Wood area, whilst the rest of the town lies on slopes that run eastwards from the ridge. The town centre appears to be densely built up but there are important and valued views between buildings out into the surrounding countryside. There are open fields to the north east of High Street and Church Street and the churchyard provides an important green space with views of the countryside beyond.
- 2.16. The town is of special historic interest, not least because of its strong association with the development of the Industrial Revolution, when Broseley was a centre for the manufacture of bricks, tiles, iron goods, pottery and clay pipes. The first iron bridge in the world was built in

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1779 to link Broseley with Coalbrookdale and Madeley and John Wilkinson constructed the world's first iron boat whilst living in the town. Abraham Darby I, who developed the process of smelting iron using coking coal, is buried in the Quaker graveyard here; the earliest recorded pipe-maker was working in the town in 1590. On the southern edge of the town, from around 1775 to 1799, Ambrose Gallimore and Thomas Turner produced at the Caughley works some of the finest soft-paste porcelain made in England in the 18th century.

- 2.17. The history of Broseley extends back to the Saxon period. The town originated in a Saxon clearance within the royal forest that covered the Ironbridge Gorge. Broseley was recorded in the Domesday Book as 'Bosle' and appears to have been a hamlet or small village.
- 2.18. In 1600, the town of Broseley consisted of 27 houses and was part of the Shirlett Royal Forest. The area was known for mining and mineworkers were permitted to build cottages on the unenclosed commons of the village. Lime quarrying and brick making were also important activities within the town and some of the stone used to build Buildwas Abbey was taken from Broseley.
- 2.19. Lawsuit records provide evidence that wooden wagon-ways existed in Broseley in 1605, giving the town a claim to the oldest railways in Britain. The wagon ways were almost certainly constructed for the transport of coal and clay and it was these resources that led to the expansion of the town during the Industrial Revolution.
- 2.20. Broseley's more rapid industrial growth began in the first quarter of the 17th. century and the settlement grew quickly with cottages in irregular plots. This can be seen in the Broseley Wood area, which became a squatter settlement. This unplanned development continued throughout the 17th. century and resulted in the maze of streets, lanes and narrow paths known as 'jitties'.
- 2.21. During the 18th. century Broseley's population of around 2000 more than doubled. Coal mining remained the most important industry which, together with local ironstone, supplied raw materials to local furnaces and those further afield. High quality local clay was also exploited for the manufacture of pottery and clay tobacco pipes. Broseley pipes were famous nationally and internationally. Southorn's pipe works survives in King Street and Legges Hill was the site of another pipe works. The local brick and tile industry expanded to meet the increasing demand for housing and commercial buildings. 18th century buildings constructed from these local materials can be seen throughout the town.
- 2.22. By the end of the 18th century some of the larger employers were building housing for their workers. This established an irregular and haphazard form of development with large houses, commercial buildings and small cottages mixed together. This is characteristic of a large part of Broseley. During the 18th century the commercial centre of the town shifted away from the church northwards towards the High Street.
- 2.23. In the latter half of the nineteenth century the area suffered a decline, as industries moved elsewhere and, at the beginning of the 20th century, the street pattern was little different from that at the end of the 18th. After the First World War some of the worst slums were cleared and a small amount of new housing was built.
- 2.24. In the last decades of the twentieth century Broseley experienced a development revival alongside the development of Telford New Town across the River Severn. Twenty first century Broseley has a number of distinct settlements including Jackfield, Broseley Wood and the Tileries. Modern development has focused on the area east of the High Street with the



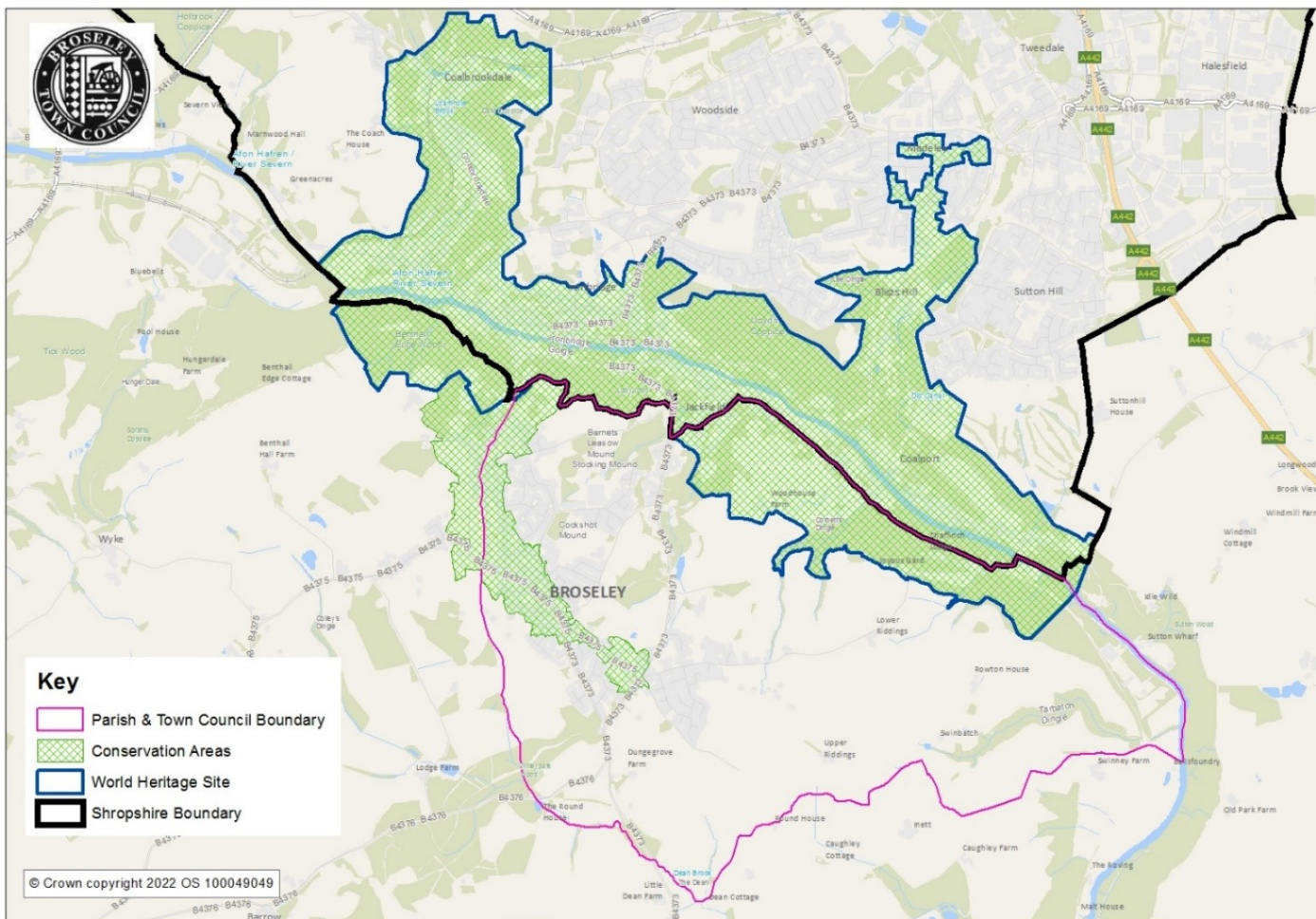
Broseley's Clay Pipes

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Tileries and Bridgnorth Road housing being the two main developments. The density, pattern, scale and type of development vary with in the Town and this variety is an important feature of Broseley's character. However, the historic core of Broseley remains largely unchanged with many of its older buildings surviving.

- 2.25. As a direct consequence of this significant and valuable heritage Broseley has two Conservation areas.
- a) The main Broseley Conservation Area is focused on the central part of the Town including the High Street and Broseley Wood. It includes part of the neighbouring Barrow PC area.
 - b) The World Heritage site in the Ironbridge Gorge, part of which falls within the Broseley boundary, is also a Conservation Area.

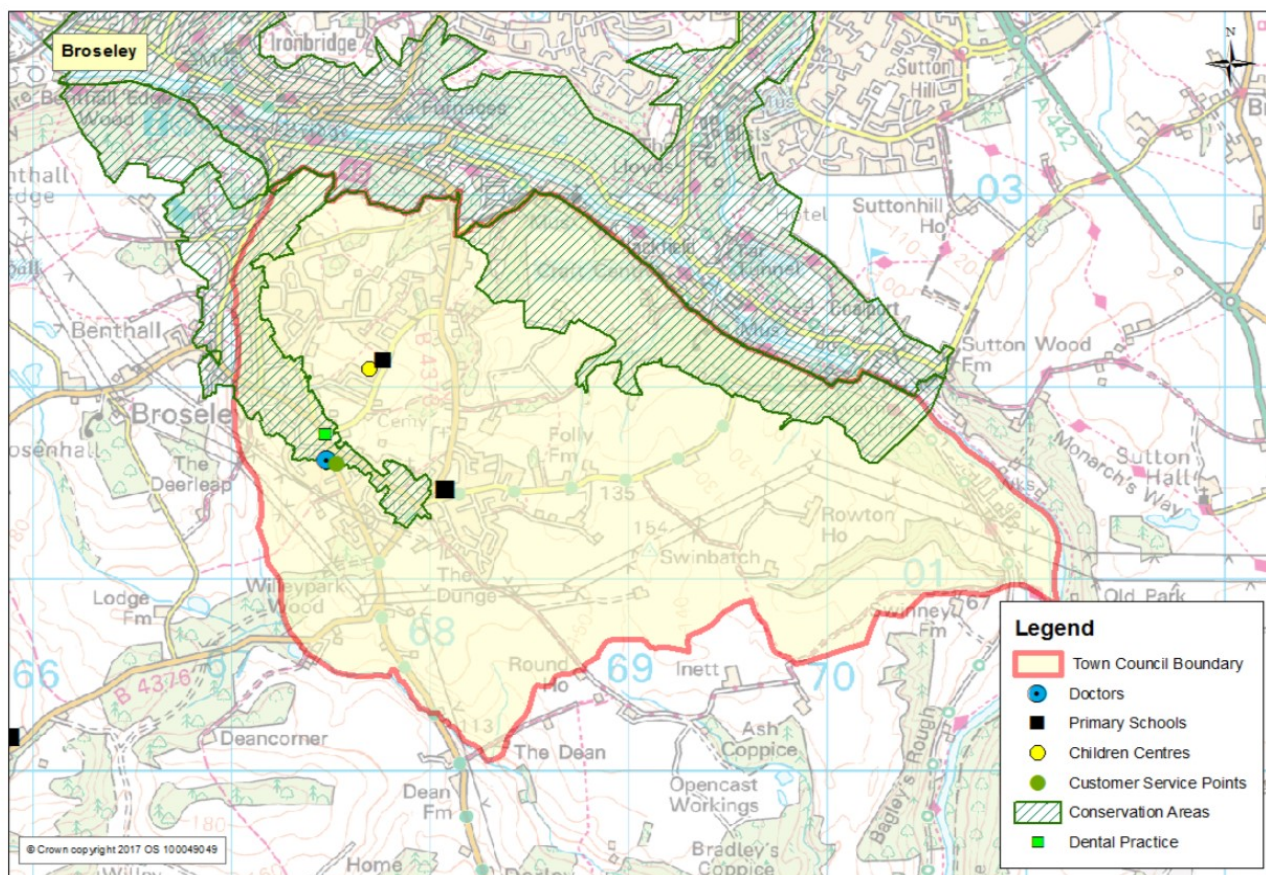
Figure 1: Components of Conservation Areas and the Ironbridge Gorge World Heritage Site within the Broseley Town Council Boundary



Broseley - key information

(from Broseley Market Town Profile produced by Shropshire Council in 2017)

Figure 2: Broseley – Key Assets



Demographics

Shropshire Town and Parish Council	1981 Census	1991 Census	2001 Census	2011 Census
Broseley	4,693	4,858	4,912	4,929

Source: Census data

- 2.26. Broseley is the ninth largest town in Shropshire by population. The latest estimate for population in Broseley is 5,600 (Mid Year Population Estimates, ONS, 2015) covering 3,272 hectares.
- 2.27. Broseley's population density was 1.7 people per hectare, making it the twelfth most densely populated of all Shropshire Market Towns. Broseley's population consists of 49% male and 51% female. The population of the Broseley area is forecast to rise to 5,700 in 2026. The largest part of this increase is expected between 2016 and 2026, when the population is forecast to rise by around 300 people or 7%.
- 2.28. The Broseley Neighbourhood Plan relates to the development and use of land within the Broseley Neighbourhood Plan Area, which was designated by Shropshire Council on the 17th September 2018.
- 2.29. The extent of this Neighbourhood Plan Area is the same as Broseley Town Council's administrative area, as illustrated on Figure 2. A large-scale map illustrating the extent and boundary of the Neighbourhood Plan Area is available via: <https://shropshire.gov.uk/planning-policy/neighbourhood-and-community-led-plans/emerging-neighbourhood-plans/broseley-neighbourhood-plan/>

Preparing the Plan

- 2.30. Broseley has a vibrant community spirit as evidenced by the multitude of clubs and societies in the Town. Arising out of this community focus came the first Town Plan, produced by the community group 'The Broseley Partnership' in 2008. This aspirational document was the basis for a more ambitious Town Plan.
- 2.31. Prepared after widespread consultation between 2011 and 2012 the Town Plan was passed by Broseley Town Council on 10th September 2013 and **its main development policies were formally endorsed and adopted as material considerations for development management purposes by resolution of Shropshire Council on 26th September 2013.**
- 2.32. In 2017, following a review of the 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 (see Appendix 1 for NPAG terms of reference and membership).
- 2.33. The Town Council applied for the designation of a Neighbourhood Area in April 2018. After a four week consultation period that started on 1st. May 2018 it was approved by Shropshire Council on 17th. September 2018 together with recognition of the Town Council as the qualifying body to produce the Neighbourhood Plan.
- 2.34. Over the spring and summer of 2018 the Neighbourhood Plan Advisory Group carried out a series of wide ranging public engagements, including public meetings, online questionnaires and an opinion survey. The details of this survey work and evidence gathering are available online on the Town Council's website and are summarised in the Consultation Statement.
- 2.35. In early 2019 Shropshire produced a 'preferred options' document as part of its Local Plan review (see para 2.5 above). This offered two preferred development options for Broseley. After further public consultation NPAG rejected both options, and subsequently agreed with the senior authority that it would allocate development sites via the Neighbourhood Plan.
- 2.36. In the summer of 2019 the Advisory Group produced a 'Strategy Paper' setting out policy proposals for the Neighbourhood Plan, copies of which were delivered to every household in the Town. A detailed consultation question paper was also distributed and the results gave direction to the final form of the Plan.
- 2.37. Following its public consultation and survey evidence the Town Council established a community vision for Broseley.

Meeting the Basic Conditions

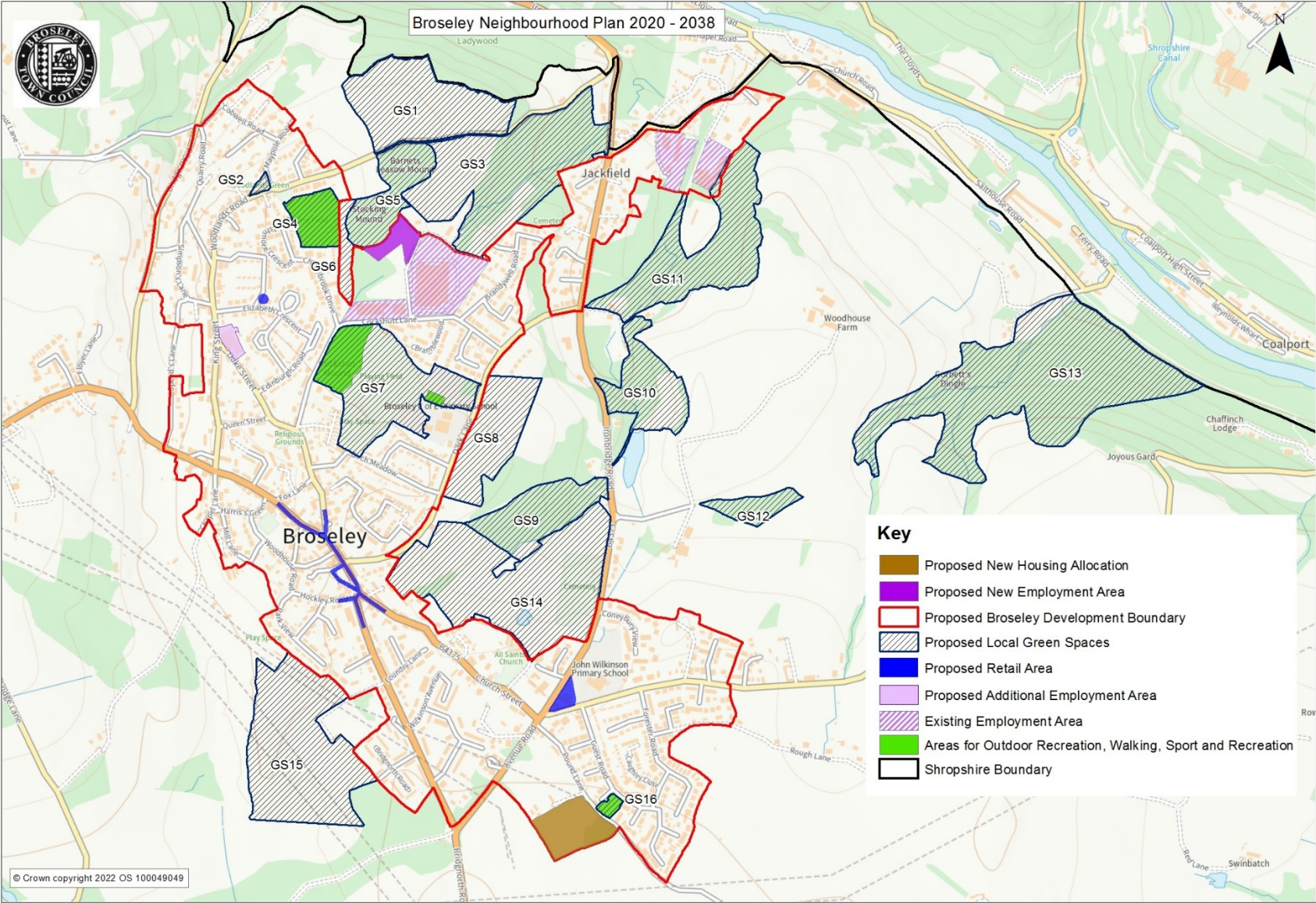
- 2.38. The Policies set out in this Neighbourhood Plan meet the 'Basic Conditions' requirement as set out in the Town and Country Planning Act to make a contribution to the achievement of sustainable development during the lifetime of the Plan. The detailed Basic Conditions Statement for the Plan is available as a separate document.

Policies and Proposals Map

- 2.39. Figure 3 is the Policies and Proposals Map associated with the Broseley Neighbourhood Plan. It supplements the Policies Map which accompanies the Local Plan.

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Figure 3: Policies and Proposals Map



3. Plan Vision and Objectives

Community Vision

“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 plays a part. We want to work with residents to preserve the Town’s existing historical and semi-rural character while embracing the opportunities of the 21st. Century.”

Plan Objectives

- 3.1. The detailed consultation that preceded the Plan produced a clear set of objectives covering the following policy areas: Housing, Employment, Green Space and Green Infrastructure, Traffic and Accessibility, Conservation and Heritage, Community Resources, Sport, Leisure and Recreation, the Visitor Economy and Sustainable Development.

Housing

- a) The provision of additional low cost housing is a high priority for the Plan and it will address the scale and location of any new development, in particular reasonably sized schemes for 100% affordable housing as exception sites.
- b) Shropshire Council’s Development Plan has set a target for the Neighbourhood of 50 new dwellings. The Plan will make sure that this target will be met by a mixture of market and social housing.
- c) New developments of market housing will normally be guided to sites within the development boundary of Broseley. Where necessary the development boundary will be changed to encompass existing or approved development outside the current boundary.

Employment and Jobs

- a) To create a prosperous and sustainable local economy with jobs for local people.
- b) To retain existing employment sites where possible and support the development aspirations of existing businesses
- c) To promote employment growth arising from small-scale start-up businesses, retail and uses supporting the visitor economy.

Green Spaces and Green Infrastructure

- a) The Plan will seek to support a valued green environment with accessible and protected green spaces
- b) To protect and where possible enhance the landscape, natural environment and wildlife within and around Broseley in association with new development.
- c) To develop the Town’s green infrastructure (footpaths, bridleways, green spaces) and consider infrastructure improvements that would benefit both the green environment and the tourist economy.

Traffic and Accessibility

- a) To examine infrastructure requirements that follow from new development outlined in the Plan.
- b) To promote road safety, the tourist economy and healthier lifestyles through improvements to walking and cycling routes.
- c) To reduce the impact of HGV vehicles passing through the Town.

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Conservation and Heritage

- a) To protect and promote the Conservation Areas whilst allowing a vibrant community to flourish.
- b) To protect the historic street layout of Broseley by ensuring that development is sensitive to the Town's heritage and character.

Community Resources

Strong community resources are an invaluable part of Broseley's character and a key factor in the quality of life for residents. The Plan will identify these resources and consider working with partner agencies and developers to secure and retain community facilities for the future.

Sport, Leisure and Recreation

- a) To protect and enhance existing provision
- b) To seek to develop sport and recreation facilities where there is a current shortfall.
- c) To consider the provision of allotments.

Supporting the Visitor Economy

- a) Broseley is adjacent to one of the UK's most important tourist attractions, the Ironbridge Gorge and its associated museum sites. The Plan will consider how Broseley can be promoted as a base for tourists wishing to explore the surrounding area.
- b) To consider proposals to support tourist related development and support tourist related business.
- c) To consider measures to protect and develop the High Street and secure investment in improving the street scene.
- d) To consider how the Plan might resist developments that could detract from the quality of Broseley's rural setting.

Achieving Sustainable Development and Responding to Climate Change

- a) The Plan will work to secure sustainable communities within the designated Neighbourhood Area.
- b) The Plan will contribute to the achievement of sustainable development.

4. Policies

Preparing the Policies

- 4.1. The Neighbourhood Plan must meet certain Basic Conditions set out in the Town and Country Planning Act; the Plan must:
 - a) Have regard to National Planning Policy and Guidance
 - b) Contribute to the achievement of sustainable development
 - c) Be in general conformity with the strategic policies in the Development Plan for the local area
 - d) Be compatible with the requirements of Human Rights legislation
 - e) Be compatible with EU Regulations
- 4.2. This means that the Broseley Neighbourhood Plan does not just restate the Shropshire Council Development Plan policies in the Core Strategy and SAMDev Documents. On the contrary, the Neighbourhood Plan sets out the views of the Broseley community on development and the use of land within the designated Neighbourhood Area. The Basic Conditions (see separate Basic Conditions Statement) are to make sure that there is an

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

acceptable balance between community control of our neighbourhood and the delivery of important national and local policies for development.

- 4.3. The policies that have been set out in this Neighbourhood Plan have been prepared taking into account the policy requirements of the National Planning Policy Framework (NPPF) and the Shropshire Plans 2011 to 2026. The Neighbourhood Plan policies are based on the objectives derived from the evidence and representations received during community consultation. The choice of policies is justified through consideration of this evidence and taking into account national and local strategic policies that have undergone Strategic Environmental Assessment (SEA).
- 4.4. It is important that the policies in the Neighbourhood Plan can be achieved during the lifetime of the Plan and that measures are in place to make sure this happens. The Town Council will monitor progress in liaison with Shropshire Council.
- 4.5. It is recognised that opportunities, challenges, pressures and Shropshire Council's development policies may change during the lifetime of the Plan and in order to keep the Plan up to date the Town Council will periodically review the plan throughout the Plan lifetime.

Plan Policies

Design

Introduction

- 4.6. The Policy is concerned with how a planned development should be carried out, so that it is in harmony with its setting, and contributes to the conservation, and, where possible, to the enhancement of the local environment.
- 4.7. The starting point for this Policy was the Conservation Area Statement for Broseley, and the 2013 Town Plan, but the various Neighbourhood Plan consultations also had an input into the process.
- 4.8. Extracts from the Broseley Conservation Area Statement:
 - "Broseley is predominantly a brick and tile town."*
 - "The local tradition of brick building is highly developed and distinctive."*
 - "The dominance of the local tile industry was almost total."*
 - "The simplest 18th century cottages often have decorative touches."*
 - "Boundary and retaining walls and railings are both complementary to the buildings and form important features in their own right."*
 - "Original 19th and early 20th century shop fronts make a valuable contribution to the character and appearance of High Street."*
- 4.9. Supporting evidence for the design principles can be found on the following links:
 - Broseley Town Plan - <https://www.broseley-tc.gov.uk/town-plan/>
 - Broseley Conservation Area Documentation - <https://www.shropshire.gov.uk/media/23075/1-broseley-conservation-area-appraisal.pdf>
 - Severn Gorge Conservation Area Documentation - https://www.telford.gov.uk/downloads/file/5698/severn_gorge_conservation_area_management_plan_2016

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Objectives

4.10. The objectives of the Policy are:

- a) to set out design principles based on local character;
- b) to work in partnership with the local planning authority within the context of existing local planning policy;
- c) to influence future policies.

POLICY D1

Development proposals that demonstrate due regard to the following design principles will be supported:

- a) Be in keeping with the form and materials that define the town's heritage
- b) Be of a design and use material that respects local character with regard to:
 - a. Floor area, roof pitch and roof height;
 - b. Size of windows and facades; and
 - c. Style and colour of brickwork and roof tiles as appropriate
- c) Where possible retain existing walls and hedges and provide boundary walls on street frontages and hedges elsewhere
- d) Incorporate the use of locally distinctive brick and/or stone headers and decorative corbels, cornices and patterned/alternating brickwork on frontages
- e) Minimise light pollution and have regard to appropriate Institution of Lighting Engineers' guidance
- f) Provide innovative high quality approaches to meeting the design principles on individual plots
- g) Incorporate the use of street furniture using materials, colour and designs that respect local character, including existing street furniture that is retained.

Housing

Strategic Policies

- 4.11. The current Local Plan comprises the Core Strategy (2011) and the SAMDev (2015). The SAMDev Plan is accompanied by a Policies Map which defined a Development Boundary for Broseley Town. The Local Plan is currently under review but the emerging Plan has not yet confirmed the future development targets. The overall strategic approach for new housing is to focus development on Shrewsbury and Principal and Key Centres. Development is proposed to be managed through criteria based policies with the delivery of local housing appropriate to the role, size and function of each settlement.
- 4.12. The adopted Shropshire Plan identifies a growth target for Broseley. 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 2038.
- 4.13. The Neighbourhood Plan will make sure that this target will be met by a mixture of market and social housing, as set out below. Together this should provide just above the 50 homes

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required. This would provide a measure of flexibility to make sure that the target set out in the Shropshire Plan is achieved.

- a) We are including the current (as of February 2020) application regarding an exception site off Dark Lane - 24 dwellings
- b) We are allocating a new development site off Avenue Road, with a total of 20 dwellings (see Appendix 4).
- c) We are assuming a reduced rate of windfall developments. Even so, given the windfall development in Broseley over the period 2014-2019, we are confident that there will be a windfall of at least 12 dwellings during the Plan period.

POLICY HO1

New housing development in Broseley will be supported on windfall sites within the Broseley Development Boundary (as illustrated on Figure 3: Policies and Proposals Map). Development should:

- a) promote local landscape character and visual amenity;
- b) promote the heritage assets of Broseley or their setting;
- c) maintain Broseley's Local Green Spaces (as illustrated on Figure 3: Policies and Proposals Map); and
- d) support the provision of evidence based affordable housing.

Development should meet at least one of the following criteria:

- a) Are located on previously used land;
- b) Fill small restricted gaps in the continuity of existing frontage buildings;
- c) Replace existing buildings; or
- d) Are suitable conversions of existing buildings.

POLICY HO2

Land off Avenue Road is allocated for housing development with an indicative capacity for 20 dwellings (see Figure 3: Policies and Proposals Map). Development proposals for this site should have regard to the criteria in Appendix 4.

POLICY HO3

New housing development within the Broseley Conservation Area will be supported if:

- a) the development preserves or enhances to the Conservation Area in respect of visual appearance and scale and is in keeping with the form and materials that define the Town's character and heritage;
- b) the development is designed to provide a sympathetic restoration of a heritage feature or property or provides a development that complements the surrounding townscape;
- c) the proposed development does not create an unacceptable load on the narrow streets of the town and, where appropriate, is able to provide adequate off-street parking and road access; and
- d) the development can be provided without a significant negative impact on the sight-lines of adjoining properties.

Evidence and Justification

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

- 4.14. The indicative capacity of Land off Avenue Road has been informed by consideration of the various planning considerations identified for the site. This includes:
- a) Ensuring that the proposed access through the adjoining site allocation does not result in excessive vehicle movements.
 - b) Local character, design and layout and other local circumstances.
 - c) There are two routes for electricity cables (pylons located to north and south of the site) running through the north-eastern element of the site which will require appropriate buffering.
 - d) Land to the north of the site has Planning Permission for a mixed-use development. It is considered appropriate to allow for a buffer between the employment units on this site and the housing on Land off Avenue Road.
 - e) The site includes areas of scrub/woodland, mature trees and hedgerows which are of ecological value and should be retained, whilst this can be incorporated into open space provision it is likely that it would reduce the site's capacity.
 - f) The site may have archaeological interest, which means a heritage assessment will be required to support any Planning Application.
- 4.15 The Neighbourhood Plan recognises that new housing is required to meet local needs in order to maintain a sustainable and prosperous community. Broseley has a shortage of suitable low cost and social housing as evidenced by figures collated by the unitary authority. The draft Shropshire Development plan identifies a target of 50 new homes up to 2038. These policies conform to that Shropshire Plan requirement. These Policies will also help to deliver the Neighbourhood Plan Objectives for housing, design and development within the Conservation Area.

Economy & Jobs

- 4.16 Most working residents of Broseley work outside the town, commuting to Telford, Shrewsbury and Wolverhampton. Broseley has three main employment sites at Cockshutt Lane, Coalport Road and Calcutts Road/Fusion in Jackfield, with a small group of workshop units at the junction of King Street and Duke Street. Another source of employment is the High Street with a wide range of shops and businesses.
- 4.17 Consultation respondents generally supported the provision of jobs to meet the needs of local people and indicated a preference for the use of previously used land or existing buildings for employment uses.

Strategic Policies

- 4.18 The adopted Shropshire Core Strategy and SAMDev Development Plan Documents set out the Shropshire-wide policies for strategic employment and Economy up to 2026. The SAMDev Plan states that development will be delivered by permitting proposals that are sustainable development and are:
- a) On committed or allocated sites;
 - b) Are otherwise suitable for development;
 - c) Comprise Class B or Sui Generis use with industrial or commercial opportunities;
 - d) Operations compatible with adjoining uses;
 - e) Satisfy the relevant settlement policy and accompanying guidelines.
- 4.19 Broseley has a number of employment premises and these will be supported to grow. Others

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

that are ready for re-use will be assessed on an individual basis.

- 4.20 This Plan will move the development boundary off Cockshutt Lane to encompass a new development that will re-use an existing site together with some additional land. This adjustment will allow Broseley's largest employer to expand their site and also allow for future growth. The new boundary is indicated on the Policies map (see Policies and Proposals Map – Figure 3 page 11) and in Appendix 5.
- 4.21 In order to protect Broseley town centre for A1, A2, A3, and A5 Class uses the Primary Shopping Area is indicated on the Policies Map.
- 4.22 All development will need to take account of known critical infrastructure constraints as identified in the Broseley Town plan and Local Development Framework Implementation Plan. Development should be phased appropriately to take account of critical infrastructure delivery and seek to positively contribute towards local infrastructure improvements, including the provision of community benefits in accordance with Policies CS8 and CS9 in the Town Plan.
- 4.23 Consultation responses supported the view that new development for non-residential purposes would best be situated to the south east of the Town, accessed from the main road, and close to the current HGV route. This Plan will therefore support windfall development in this area for employment, that meets the relevant policy criteria, including proposals that fall outside the development boundary.

POLICY EJ1

Proposals for new B2, B8, E, F1 and F2 Class industrial, business and commercial development in Broseley will be supported subject to the following criteria:

- a) The scale and nature of the proposed development would not have a significant adverse effect on the amenity of neighbouring residential areas;
- b) The proposal would not have a significant adverse unacceptable impacts on the local road network;
- 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 a significant adverse impact on adjacent land uses; and
- f) The proposal promotes the character of the area.

Proposals to change existing employment land to alternative uses will 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 for a reasonable period of time and no reasonable offers have been refused.

POLICY EJ2

Existing employment land shown in Figure 3: Policies and Proposals Map will be retained in employment use where possible and development proposals which maintain or enhance existing employment use will be supported.

POLICY EJ3

Land off Cockshutt Lane is allocated for employment use (see Figure 3: Policies and Proposals Map). Development proposals for this site should have regard to the criteria in Appendix 5.

POLICY EJ4

Proposals for new retail floor space within a Retail Area (see Figure 3: Policies and Proposals Map) will be supported if the development complements and/or diversifies local retail provision and is compatible with the scale and form of the existing retail sites.

POLICY EJ5

Proposals that promote or provide facilities for home working and businesses operating from home in Broseley will be supported where the proposal does not have a significant harmful effect on the amenity of neighbouring residential areas.

POLICY EJ6

The sympathetic conversion of existing buildings for business and enterprise will be supported where the proposal does not have a significant impact on adjacent buildings, adjacent land uses or the character of the area.

Evidence and Justification

- 4.24 These policies will help to deliver the Neighbourhood Plan Objectives in respect of retaining and enhancing existing businesses, creating new economic opportunities and jobs, protecting the High Street and supporting the visitor economy.

Green spaces and infrastructure

- 4.25 Early consultation emphasized the importance of the environment, green spaces and open space to local people. In particular 'Valued Green Spaces' that help to create the character of Broseley and provide strong visual features that define the surrounding area and provide important views into the open countryside were recognised and strongly supported. The Broseley Town Plan identified a number of these 'Valued Green Spaces' and they were endorsed and adopted by Shropshire Council. The 'Valued Green Spaces' are particularly important in shaping the character and environmental qualities of Broseley.
- 4.26 The Valued Green Spaces have been carefully chosen because of their importance in the locality and their significant contribution to the appearance of Broseley. The Valued Green Spaces have been selected using the following criteria*:
- a) They have an existing designation – as part of the World Heritage Site, as a 'Field in Trust' or Wildlife Site;
 - b) They have public access;
 - c) They provide heritage value;
 - d) They have environmental value;
 - e) They provide visual amenity, with views from within the urban parts of Broseley out into the open countryside that are characteristic of the Town;
 - f) They create open green areas that help to frame the physical form of Broseley, with its unique combination of built areas and open green space;
- * A full assessment of each Valued Green Space against these criteria can be found at Appendix 3.

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

- 4.27 Consultation representations indicated that residents want the Neighbourhood Plan to protect and where possible enhance Broseley's open spaces. Respondents expect new green spaces to be provided with new housing development and the links between them to be improved.
- 4.28 The location of the town centre, as designated within the adopted Local Plan (which is comprised of the Core Strategy (2011) and the SAMDev (2015)), is identified on the Local Plan Policies Map which accompanied the SAMDev Plan. The designated town centre focuses on the High Street and is similar to the proposed retail area illustrated on Figure 3: Policies and Proposals Map.

Strategic Policies

- 4.29 National Planning Policy seeks to promote healthy communities and provide residents with a high quality of life. Green spaces play an important role in providing play areas, recreation grounds and sports facilities. Within Broseley the open spaces are an important part of its character and enhance the quality of life for local people. Policy CS8 of the Shropshire Core Strategy highlights the need to protect and enhance existing facilities for residents and visitors.

POLICY GR1

The following areas are designated as Local Green Space (see Appendix 3):

Map Code	Description
GS1	Balls Lane Fields
GS2	Woodlands Green
GS3	Fish House Woods
GS4	Cricket Club Fields
GS5	Stocking Mound & Barnett's Leasowe Mound
GS6	Cherrybrook Passage
GS7	Birchmeadow Fields
GS8	Dark Lane Fields
GS9	The Haycop
GS10	Monewood South
GS11	Monewood North
GS12	Corbett's Bridleway & Coppice
GS13	Corbett's Dingle
GS14	Church Fields
GS15	Fiery Fields
GS16	Guest Road Play Space

POLICY GR2

New development will be supported where it does not have a significant adverse impact on formal and informal open spaces, including gardens, which are important to the community for their beauty, amenity, wildlife and/or recreational value.

POLICY GR3

New developments will be encouraged to create accessible links from development sites to the wider rights of way network to address gaps in the network and to improve existing provision.

POLICY GR4

Public rights of way through green spaces in Broseley will be protected and, where possible enhanced. Development proposals will be supported which improve the network, including through the provision of permissive paths and the delivery of green routes in the following locations (see Figure 5: Map of the Green Routes in Broseley Parish):

- a) A route into the Gorge through the Haycop and the Monewood Valley;
- b) A route into the Gorge down Corbetts Dingle to the Jackfield Free Bridge;
- c) A route following Pound Lane into the Gorge and to the Severn Valley Way;
- d) A short route from Maypole Road, crossing Balls Lane then alongside the Stocking Mound to Cherrybrook.
- e) A route from Cobwell Road to Ironbridge Road, via Balls Lane and Brandywell Road and the Red Church

POLICY GR5

Development proposals should retain important hedgerows, mature trees and existing areas of woodland where possible and to improve the connectivity between green spaces to enhance the green infrastructure of the Town.

POLICY GR6

Proposals for allotments close to the town centre will be supported.

POLICY GR7

New development will be supported where there is a positive impact on the quality and visual appearance of the open countryside around Broseley.

Evidence and Justification

- 4.30 These Policies help to deliver the Neighbourhood Plan Objectives for protecting 'Valued Green Spaces', protecting green routes, footpaths and bridleways and the overall green environment within and around Broseley. These Policies conform to the National Planning Policy Framework (NPPF) 2018 and the Shropshire strategic development policies as set out in the Core Strategy and the SAMDev Plan.

Figure 4: Map of the Public Right of Way Network in and around Broseley Parish

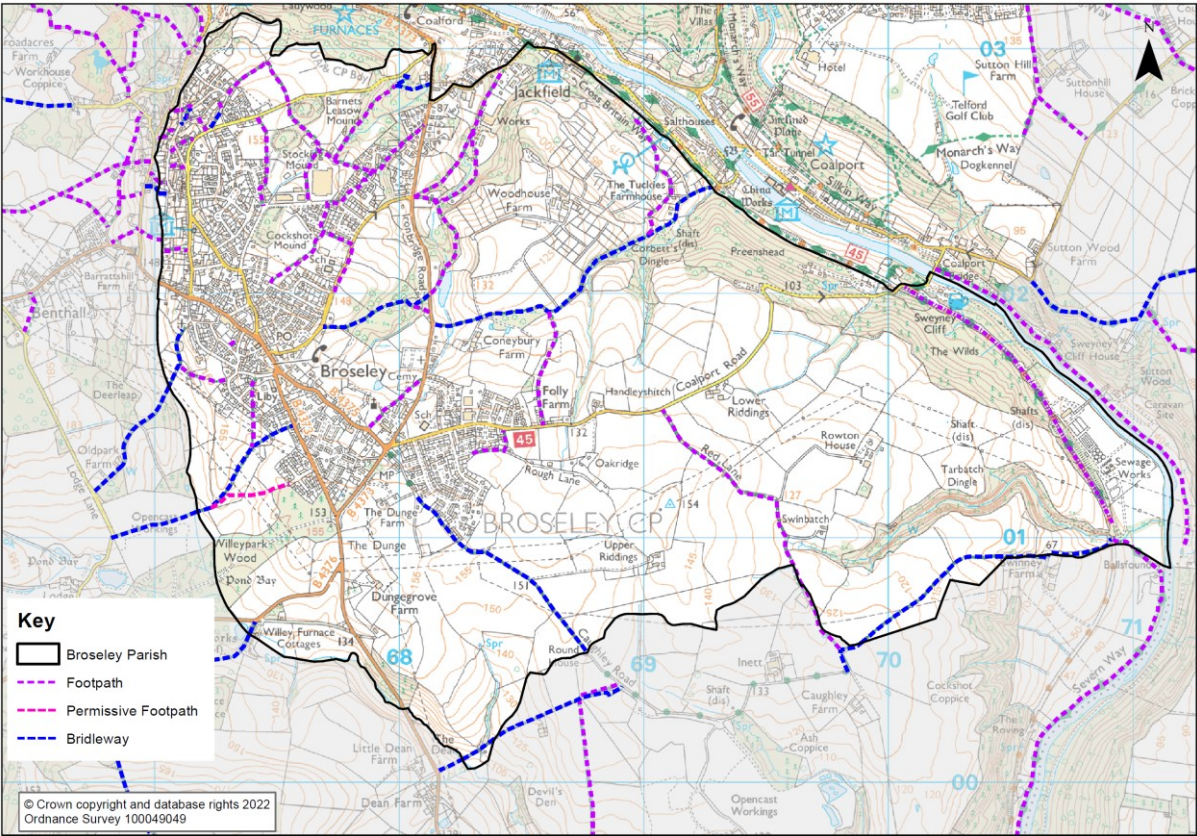
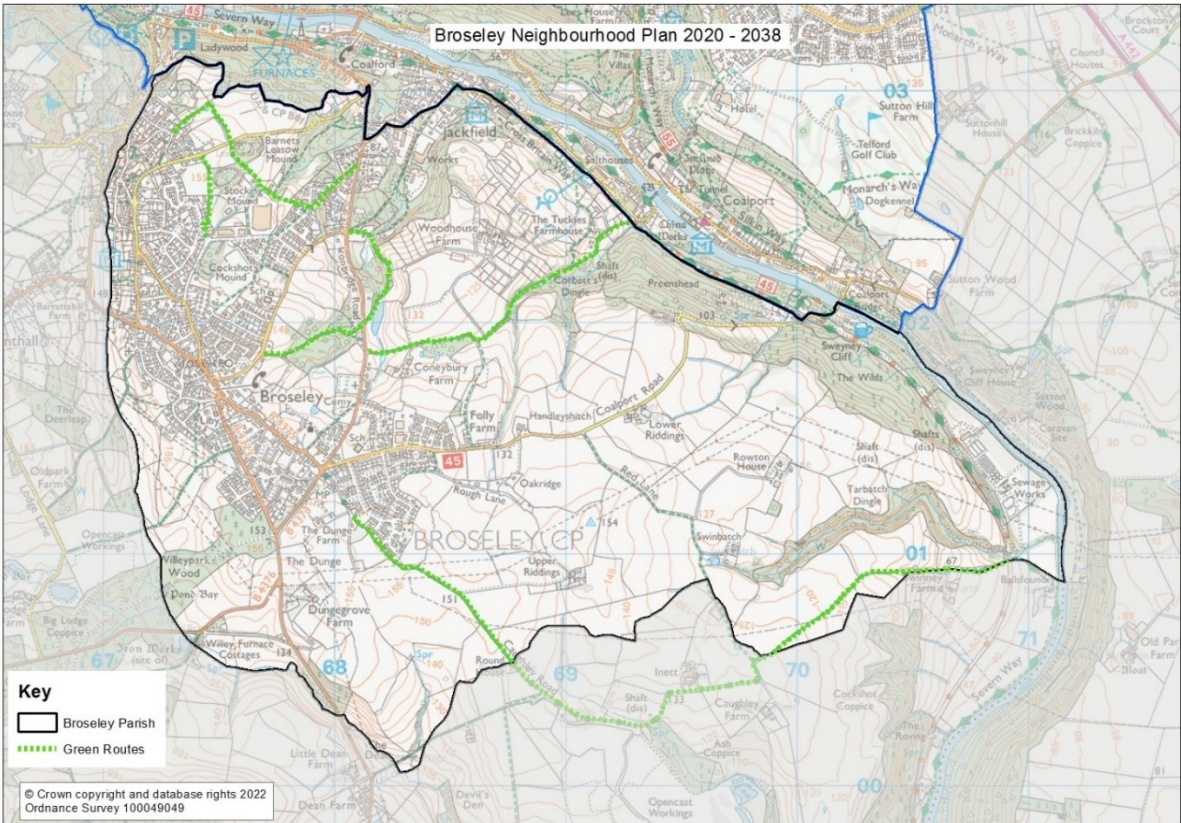


Figure 5: Map of the Green Routes in Broseley Parish



Community Resources

- 4.31 Broseley is fortunate in having a rich variety of community groups and organisations working in and for the town. A significant number of respondents to the early consultation referred to the importance of community facilities to serve local people. The Town Council supports working with local groups as a vital element of Broseley's community resources.
- 4.32 The Town Council supports community resources such as the Birchmeadow Centre, Birchmeadow Park, Multi Use Games Area, Victoria Hall and others. The Town Council will work with partner agencies and developers to help to provide new community facilities. The Town Council will also work with school governing bodies and the Health Centre Management Team to protect and promote safe and broad access to these facilities as part of Broseley's community infrastructure.

Strategic Policies

- 4.33 The Shropshire Core Strategy sets out the importance of market towns and other key centres and proposes appropriate targets for growth and development. Shropshire Policy CS 15 states that rural settlements (such as Broseley) will be supported by the protection and improvement of existing day-to-day services and facilities. Proposals that make a positive contribution to settlements will be encouraged.
- 4.34 The NPPF (2018) supports planning policies and decisions that promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

Policy Objectives

- 4.35 Strong community resources are a vital part of Broseley and the quality of life for its residents. Early consultation indicated that residents want existing community resources to be protected in order to contribute to community wellbeing and provide benefit for local people.

POLICY CR1

Development proposals that would result in the loss of community resources and facilities in Broseley should demonstrate that:

- a) The community resources and facilities are no longer required; or either
- b) That alternative appropriate provision exists or will be provided elsewhere in the community to serve local people; or
- c) Suitable alternative resources and facilities are included in the proposal.

POLICY CR2

Proposals for new and/or improved community facilities in Broseley will be supported subject to:

- a) The proposal would not have a significant and harmful impact on the amenity of surrounding residential areas;
- b) The proposal would not have a significant and harmful impact on the local

Evidence and Justification

- 4.36 To make sure that Broseley remains a vibrant place to live it is essential that community resources and facilities are retained and the loss of such facilities is resisted and their improvement supported.

Supporting the visitor economy

- 4.37 Broseley is within half a mile of the Ironbridge Gorge, one of the UK's most important visitor attractions; two of the Ironbridge Gorge Museum sites are located in Broseley. Yet the town has a lower profile than its neighbours Ironbridge and Much Wenlock. Consultation responses with local business suggest that visitors tend to book overnight stays in Broseley when the higher profile locations are fully booked.
- 4.38 Given the consultation results set out above the Town Council takes the view that the best tourist strategy for Broseley is to focus on day visitors and short stay visits by people who want a base from which to explore the area. Such visits are important in helping to support town centre employment. The key to this approach is the appeal of a lively and historic small town with a range of hospitality services set in unspoilt countryside.
- 4.39 Accordingly the Town Council believes that more should be done to promote and market the town as a regional base for visitors to explore Broseley and the surrounding area.

Strategic Policies

- 4.40 Shropshire Core Strategy Policy CS 16 – Tourism, Culture and Leisure seeks to deliver high quality, sustainable tourism, cultural and leisure development that enhances the vital role that these sectors play in the local economy, bringing benefits for local communities and visitors. Shropshire's strategy recognises the intrinsic qualities of the natural and built environment and places emphasis on:
- a) Supporting the development of new or extended tourism, cultural and leisure facilities;
 - b) Promoting connections between visitor attractions, including the natural, cultural and historic environment, active recreation venues, heritage trails, parkland, local food and drink and craft sales outlets;
 - c) Supporting development that promotes opportunities for visitors to access, interpret and enjoy the local landscape, historic and cultural assets;
 - d) Supporting appropriate regeneration schemes and tourist development proposals that seek to provide local economic, social and cultural benefits;
 - e) Encouraging the development of facilities that support tourism in appropriate and accessible locations.

Strategic Objectives

- 4.41 The Town Council aims to protect existing tourist related employment. It will work to promote Broseley as a tourist destination, with support for businesses in the town that serve the tourist trade. This includes opportunities for self-employment and start-up businesses.
- 4.42 Protecting and improving the High Street by seeking investment to provide improvements to the street scene was an important objective for respondents to the early consultation. Respondents also recognised that the protection of green space, recreation, play and outdoor facilities is important for visitors as well as residents.

POLICY VE1

Proposals for tourist related development, including outside the development boundary, will be supported when:

- a) The proposal will enhance an existing business on the same site;
- b) The proposal provides a conservation gain by restoring or improving the sustainable use of an historic feature or property; or
- c) The proposal will create a new tourist related business on a suitable site that does not have a significant adverse and harmful impact on neighbouring residential areas or the quality and visual appearance of the countryside around Broseley.

POLICY VE2

Development proposals should avoid any significant adverse impact on the character of the countryside between the Broseley Development Boundary and the Ironbridge Gorge World Heritage Site.

POLICY VE3

The following areas used for outdoor recreation, walking, sport and recreation identified on the Policies Map will be protected and where possible enhanced:

- Birchmeadow Fields;
- Cricket Club site;
- Multi-use Games Area; and
- Guest Road play-space.

Evidence and Justification

- 4.43 Sustainable tourism and high quality cultural and leisure development can deliver wide ranging benefits for the local community by contributing to a successful visitor economy and supporting the quality of life for local people. Tourism plays a significant role in the economic prosperity of Shropshire and appropriate tourist development in particular, can potentially help to sustain rural services and facilities that provide local community benefit.

Achieving sustainable development and responding to the challenge of climate change (including water infrastructure)

- 4.44 Respondents to the early consultation highlighted the importance of renewable energy and responding to climate change. They would support appropriate development in Broseley that incorporates renewable energy technologies into new development that is well adapted to climate change and where energy conservation is considered at the earliest stage.
- 4.45 Following the Deregulation Act 2015 the Building Regulations provide the minimum standards for energy efficiency in new buildings.

Strategic Policies

- 4.46 The National Planning Policy Framework 2018 requires planning authorities to help shape places to secure radical reductions in greenhouse gas emissions, minimizing vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.

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- 4.47 Local planning authorities are required to plan for new development in locations and ways that reduce greenhouse gas emissions. Where setting any local requirements for a building's sustainability planning authorities should do so in a way consistent with the government's zero carbon building policy and adopt nationally prescribed standards. To help increase the use and supply of renewable and low carbon energy local planning authorities should recognize the responsibilities on all communities to contribute to energy generation from renewable or low carbon sources. They should have a positive strategy to promote the use of energy from renewable and low carbon sources.
- 4.48 The NPPF 2018 sets out a number of policies to guide local authorities in design, the location of renewable energy infrastructure and support community led initiatives for renewable and low carbon energy including through Neighbourhood Planning and identify opportunities where development can draw its energy supply from decentralized energy sources. Planning authorities should also take account of: landform, layout, building orientation, massing and land supply to minimize energy consumption.
- 4.49 The Shropshire Core Strategy promotes low carbon development that mitigates and adapts to the effects of climate change, including flood risk, by promoting more responsible transport and travel choices, more efficient energy and resources, the generation of energy from renewable sources and effective and sustainable waste management.
- 4.50 The phasing of new sewerage and waste-water treatment infrastructure, which may be required to serve new development, needs to avoid overburdening water resources. The Shropshire Water Cycle Study (2020) assesses the impact of new development on the county's water infrastructure and shows where development may be dependent upon upgrading and enlarging the existing network. Policy SD4 recognises this and responds to the need identified in the Appropriate Assessment for mitigation against unacceptable impacts on the Severn Estuary European Marine Site. This Policy arose out of consultation with Shropshire Council and is in general conformity with the Shropshire strategic development policies.

POLICY SD1

Development proposals should be designed to be energy efficient and sustainable. Relevant planning applications should include a statement setting out how the development will achieve this, including as appropriate:

- a) Siting and orientation to optimise passive solar gain;
- b) The use of energy efficient measures such as loft and wall insulation and double glazing; and
- c) The installation of energy efficiency measures such as loft and wall insulation and double glazing;
- d) The incorporation of on-site energy generation from renewable sources.

POLICY SD2

The retro-fitting of heritage assets is encouraged to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards the historic characteristics of the asset.

POLICY SD3

Non-residential development meeting the Building Research Establishment (BREEAM) “excellent” standard will be supported.

POLICY SD4

Development proposals are required to demonstrate that they will be served by adequate water supply, foul drainage, wastewater and sewage treatment infrastructure. In particular, proposals should show how development will be phased to allow the relevant water company sufficient time to undertake any necessary capacity improvement works to the existing water supply, wastewater and foul drainage networks and waste-water treatment works prior to construction and occupation of the development. Where development is bought forward in advance of planned capacity improvements by the relevant water company through their Asset Management Process, any required capacity improvements should be delivered via agreement between the developer and the water company.

Evidence and Justification

- 4.51 These Policies conform to the NPPF and are in general conformity with the Shropshire strategic development policies set out in the Core Strategy and SAMDev Plan.

Development Boundary

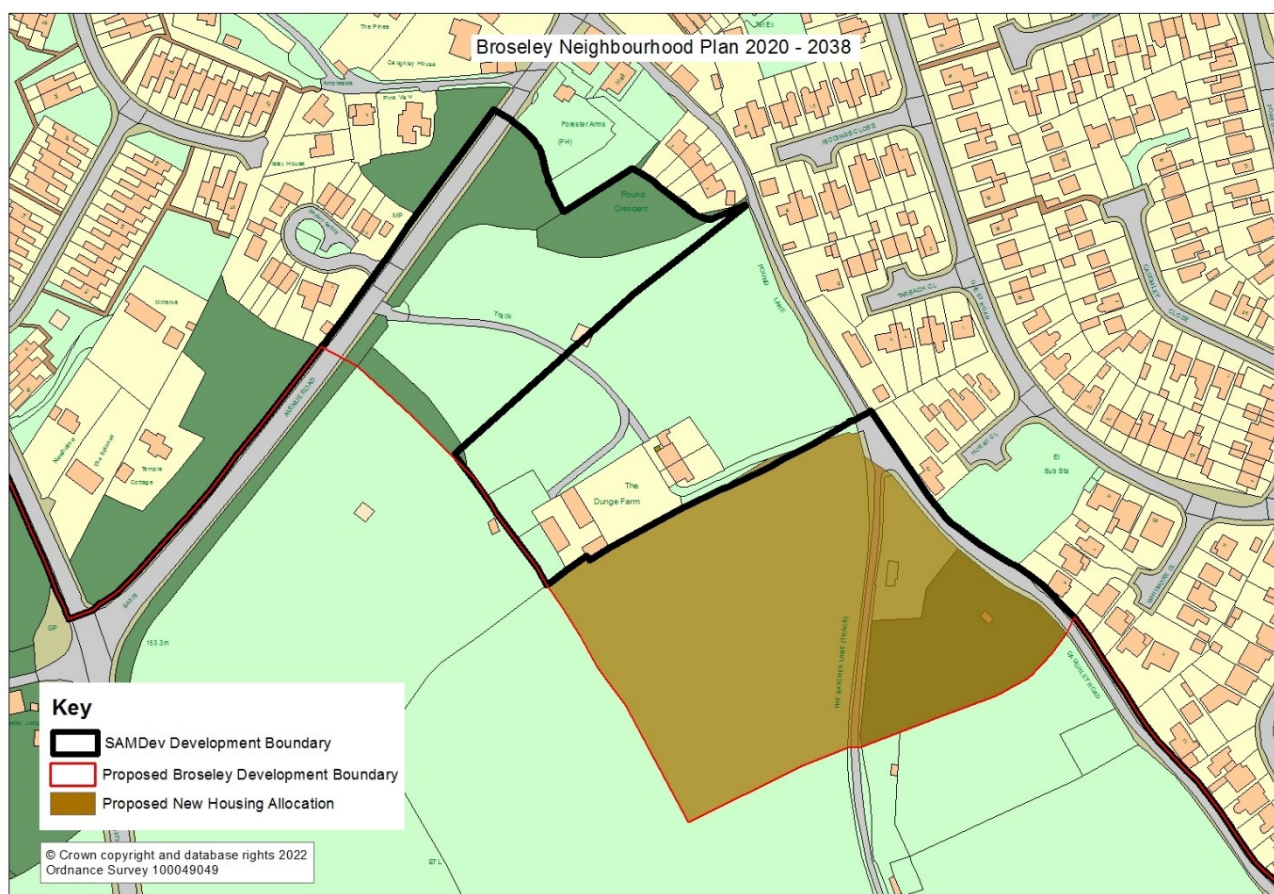
- 4.52 The adopted Local Plan for Shropshire (which is comprised of the Core Strategy (2011) and the SAMDev (2015)) is accompanied by a Policies Map which illustrates geographically the application of policies in the adopted Local Plan. This Policies Map includes the identification of settlement development boundaries, including for the settlement of Broseley (this is shown in Appendix 6).
- 4.53 To contribute to the achievement of sustainable development in Broseley, the Neighbourhood Plan sought to meet the proposed development guidelines for Broseley within the emerging Shropshire Local Plan, both for employment land and housing.
- 4.54 With regard to housing, detailed and exhaustive consultation identified a suitable site for allocation to provide housing located outside but adjoining the development boundary on the Policies Map which accompanies the adopted Local Plan.
- 4.55 With regard to employment, in addition to consideration of the proposed development guidelines for Broseley within the emerging Shropshire Local Plan, consultation on this Neighbourhood Plan identified a need for an expanded site for Broseley's largest manufacturing employer. The Neighbourhood Plan subsequently identified an appropriate site for this expansion to occur upon, this site is located outside but adjoining the development boundary on the Policies Map which accompanies the adopted Local Plan.

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4.56 This Neighbourhood Plan therefore makes two changes to the development boundary for Broseley shown on the Policies Map which accompanies the adopted Local Plan. These are:

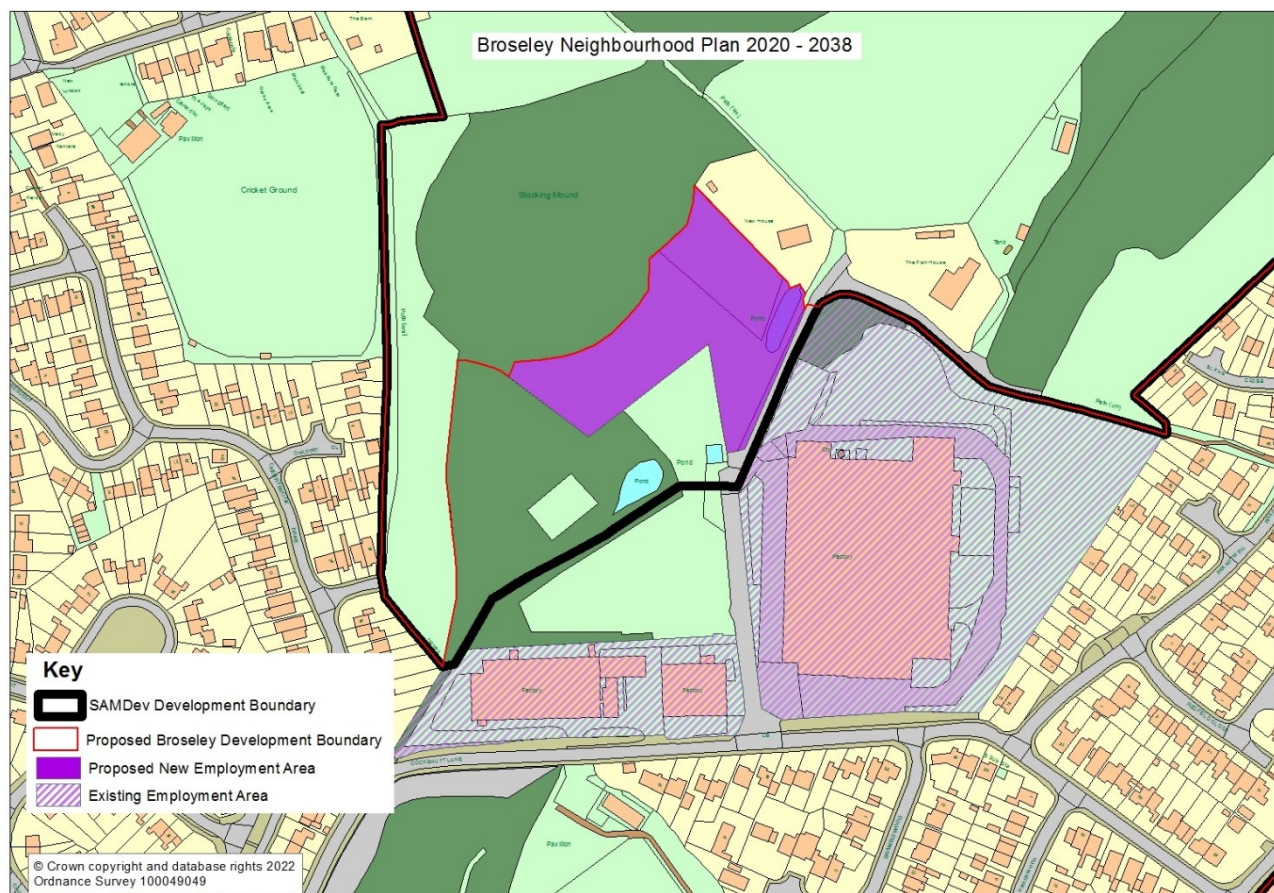
- a) The boundary is being changed to accommodate a new housing allocation off Avenue Road as set out in Policy HO2 and in Appendix 4. This boundary change is illustrated on Figure 6 below:

Figure 6: Change to the Development Boundary to Accommodate the Housing Allocation off Avenue Road Identified in Policy HO2



- b) The boundary is being changed to accommodate an enlarged employment site off Cockshutt Lane as set out in Policy EJ3 and in Appendix 5. This boundary change is illustrated on Figure 7 below:

Figure 7: Change to the Development Boundary to Accommodate the Enlarged Employment Site off Cockshutt Lane Identified in Policy EJ3



POLICY DB1

The Development Boundary for Broseley is as provided in Figure 3: Policies and Proposals Map.

5 Monitoring and Review

- 5.1 Shropshire Council as the Local Planning Authority will monitor progress in relation to the implementation of the Core Strategy and SAMDev Plan. This will include housing and employment and the other components of development as part of their Annual Monitoring Report (AMR).
- 5.2 Broseley Town Council will work in liaison with Shropshire Council to assist in this process and contribute to the AMR in respect of development in Broseley.
- 5.3 The Town Council will prepare regular monitoring reports to assess the impact of the Plan.
- 5.4 The Town Council will review the Plan on an annual basis and undertake a full review in 2024.

6 Appendices

Appendix 1

Broseley Neighbourhood Plan Advisory Group Membership and Terms of Reference

Membership

Michael Burton*
Sharon Clayton #
Ryan Garbett #
Simon Harris * **
Ann Maltby *
Colette McCabe *
Phil Revell *** *
Dave Ricketts
Ian West *#

* BTC Councillors
** County Councillor
*** Chair
left the group before the Plan was finalised

Phil Revell and Colette McCabe were elected as Town Councillors in December 2019 and January 2020 respectively. Phil Revell chaired the group throughout.

NPAG received specialist advice from Michael Barker BA (Hons). MSc. Dip TP. DMS. DipM. MRTPI. FRGS. Michael Barker is an independent planning consultant, previously Assistant Director and member of the Senior Management Team at Telford & Wrekin Council.

Terms of Reference

Purpose

- a. The purpose of the Broseley Neighbourhood Plan Advisory Group (NPAG) is to carry through the preparation of a Neighbourhood Plan (NP) for the Broseley area in order that this will then progress to Independent Examination and a successful community referendum and ultimately be adopted by Shropshire Council to become planning policy.
- b. The NPAG will engage with the local community to ensure that the NP is truly representative, maximising support for the approach taken by ensuring high levels of community engagement throughout the plan-making process.

Principles

- a. The Advisory Group will undertake the process in a democratic, transparent and fair fashion, encouraging widespread participation and giving equal consideration to opinions and ideas from all members of the community
- b. All decisions made shall be fully evidenced and supported through consultation with the local community.

In order to achieve this, the Advisory Group will:

- i. Produce, monitor and update a project timetable;
- ii. Produce a consultation and engagement strategy, showing how the public will be involved throughout the process;

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- iii. Carry through the strategy, ensuring as far as possible that the final NP is representative of the views of residents;
- iv. Regularly report back to Broseley Town Council;
- v. Identify and secure funding;
- vi. Liaise with relevant authorities and organisations to make the plan as effective as possible.
- vii. Produce a draft version of the Neighbourhood Development Plan for ratification by the Town Council.

Membership

- a. The NPAG will be made up of a cross-section of volunteers from the Broseley communities, including Town Councillors.
- b. There will be at least six members of the NPAG, with a maximum of twelve and a minimum of three Broseley Town Councillors.
- c. The NPAG may co-opt additional members to the group at any time, subject to a recorded vote at a NPAG meeting.

Decision Making

- a. Broseley Town Council delegates full authority to the Advisory Group to work on the Neighbourhood Plan up to and including publication of the Consultation Draft Plan.
- b. The plan-making process remains the responsibility of Broseley Town Council as the qualifying body.
- c. All publications, consultation and community engagement exercises will be undertaken by or on behalf of the Town Council with appropriate recognition of the Town Council's position given in all communications associated with the project.

Meetings

- a. Advisory Group meetings will take place as and when required but not less than once every two months.
- b. The dates of future meetings will be made publicly available.
- c. The Advisory Group will elect a Chair and Secretary from its membership to remain in those positions until the project is completed. If these positions become vacant, the Advisory Group will elect an alternate.
- d. The Secretary shall keep a record of meetings and circulate notes to Advisory Group members and the Town Council in a timely fashion. Minutes shall be made publicly available.
- e. Minutes of the Advisory Group, along with correspondence and other formal documentation will be held by the Town Clerk.
- f. At least 5 clear days' notice of meetings shall be sent to members.
- g. Decisions made by the Advisory Group should normally be by consensus at Advisory Group meetings. Where a vote is required each member shall have one vote. A minimum of three members shall be present where matters are presented for decisions to be taken. A simple majority vote will be required to support any motion. The Chairman shall have one casting vote.

Working Groups

- a. The Advisory Group may establish working groups, made up of volunteers from the community to aid them in any Neighbourhood Plan related work.

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- b. Each working group should have a representative from the Advisory Group who will report back to the NPAG.

Finance

- a. All grants and funding will be applied for and held by the Town Council, who will ring-fence the funds for Neighbourhood Plan work. All payments will be processed in accordance with Broseley Town Council's financial procedures.
- b. The NPAG will have delegated authority to spend monies so ring-fenced without further reference to the Town Council. NPAG will also have delegated authority to spend monies allocated by the Town Council for the Neighbourhood Plan project.
- c. Specific items of expenditure will be approved via a minuted resolution at a NPAG meeting, said resolution to be counter-signed by three Broseley Town Councillors present at the relevant meeting.
- d. Advisory Group members and volunteers from any working groups may claim back any previously agreed expenditure incurred during any Neighbourhood Plan related work in accordance with Broseley Town Council's procedures.

Conduct

- a. Advisory Group members will abide by the 'Nolan' principles of public life and the Town Council Code of Conduct, including declarations of interest.
- b. Whilst members as individuals will be accountable to their parent organisations, the Advisory Group as a whole is accountable to the wider community for ensuring that the Plan reflects their collective expectations.
- c. The Advisory Group will achieve this through applying the following principles:
 - i. Be clear and open when their individual roles or interests are in conflict;
 - ii. Treat everyone with dignity, courtesy and respect regardless of their age, gender, sexual orientation, ethnicity, or religion and belief;
 - iii. Actively promote equality of access and opportunity.

Dissolution

The Advisory Group will be dissolved once its objectives have been attained or when the Town Council considers its services are no longer required.

Appendix Two

Broseley Neighbourhood Plan - timeline of key events

11 July 2017	Broseley Town Council (BTC) resolves to explore the idea of drawing up a NP.
1 November 2017	First meeting to discuss the route to creating a NP, with attendance from Shropshire Council and a representative from Shifnal, who had a made plan.
14 November 2017	BTC resolves to set up a steering group, with town councillors and interested members of the public. This steering group, later to be called the 'Broseley Neighbourhood Plan Advisory Group' (NPAG) meets most months from thereon.
9 January 2018	BTC delegates an initial budget to the steering group.
26 January 2018	First public meeting held to launch the 'Broseley and Benthall Neighbourhood Plan'. Work starts on defining the NP boundary; following informal consultation with Barrow Parish councillors, it is proposed that parts of Barrow be included.
13 March 2018	BTC approves NPAG terms of reference and agrees to submission of an application to Shropshire Council to designate the NP area.
15 March 2018	Barrow Parish Council rejects the proposal that parts of Barrow Parish be included in a NP along with Broseley.
10 April 2018	BTC approves revised terms of reference for NPAG (excluding any involvement of Barrow Parish) and agrees to submission of an application to Shropshire Council to designate the NP area, comprising the whole of Broseley Town and nothing else.
19 April 2018	Application to designate the NP area is sent to Shropshire Council. The four week consultation period starts on 1 May 2018.
24 May 2018	Grant of £1,525 from Locality is approved.
June 2018	First public consultation takes place, with a questionnaire delivered to every household in Broseley, plus an on-line version of the poll.
July 2018	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.
17 September 2018	Shropshire Council approves the application to designate the NP area.
22 September 2018	Public meeting held on the subject of Heritage and Environment.
27 October 2018	Public meeting held on subject of Public and Voluntary Services.
December 2018	Consultation with local businesses is launched.
29 January 2019	Public meeting held on housing and other development. Second public consultation (paper and online) on specific development sites is launched.
March 2019	Programme of meetings with landowners etc commences.
14 May 2019	BTC approves appointment of Michael Barker as planning consultant to help write NP.
15 May 2019	Public meeting held to provide update on all aspects of NP and announce plans for next public consultation.
12 June 2019	Grant of £7,320 from Locality is approved.
July-August 2019	Third public consultation takes place, with briefing document and questionnaire delivered to every household in Broseley.
September 2019	Results of third public questionnaire published.
14 th January 2020	Working draft of NP approved by Broseley Town Council.
January	NP Display with maps and executive summary in Broseley Library.
19 th February 2020	Public Meeting to present draft NP.
10 th March 2020	BTC approves draft Neighbourhood Plan for section 14 consultation.
September 2020	BTC begins Section 14 consultation
29 th April 2021	BTC approves Neighbourhood Plan for section 15 consultation.
April 2021	BTC submits Section 15 version to Shropshire Council

Appendix Three

Valued Green Space

The 2013 Broseley Town Plan, in response to strong demand expressed through consultation, designated a number of areas of the Town as 'local green space'.

During the Neighbourhood Plan consultation process the Neighbourhood Plan Advisory Group (NPAG) were asked to consider additional areas for protection. NPAG therefore re-consulted on all the areas identified. As before there was a high degree of local support for a specific designation to protect these areas. NPAG were advised on this issue by an Environment and Heritage sub-group, and the following matrix arises out of that work.

NPAG identified criteria that might support a 'valued green space' designation, and scored each area put forward against those criteria. An area had to achieve a score of 4, (with at least one maximum score of 3) before it was included in the Neighbourhood Plan.

The Criteria

Existing designation – as recreational space, conservation area, wildlife site, village green, Field in Trust (3 points)

Public Access – Open space (3 points), access via a footpath, bridleway or permissive path (2 points), limited access via a footpath or permissive path (1 point), no public access (0 points)

Heritage value – As identified by a recognised heritage listing (3 points), locally identified heritage value (2 points), as a buffer zone to a recognised heritage site (1 point)

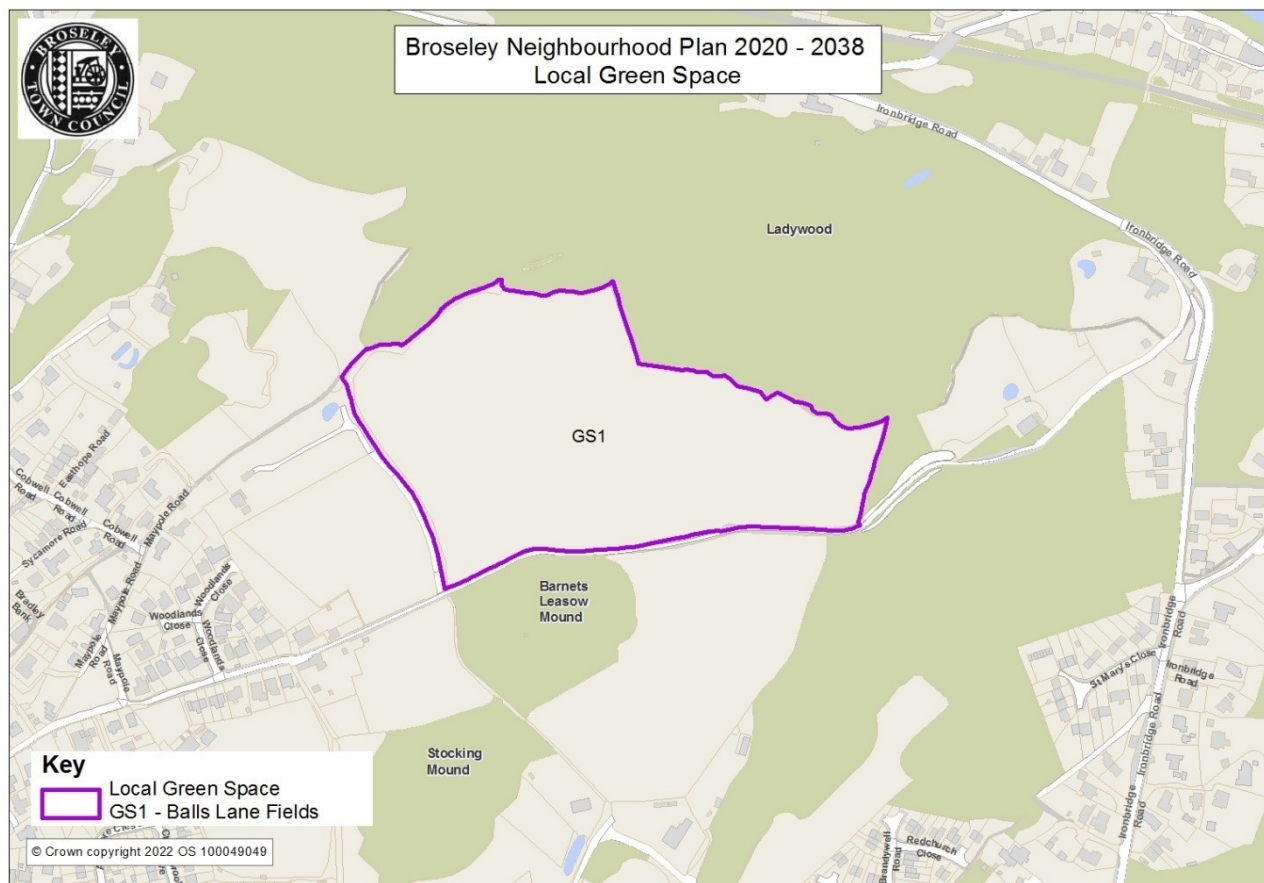
Environmental value – ancient woodland or rare species/habitat (3 points), area with more diverse flora, eg woodland, meadows, hedgerows, able to support range of flora and fauna (2 points), Area with limited biodiversity eg fields, grass land etc (1 point), as a buffer zone to a designated wildlife site (1 point)

Visual Amenity – Open views offering significant visual amenity (3 points), views to open countryside as referenced in Broseley Conservation Statement (2 points), limited views over green fields or of/from a significant local building or landmark (1 point)

BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.1: Ball Lane Fields Local Green Space

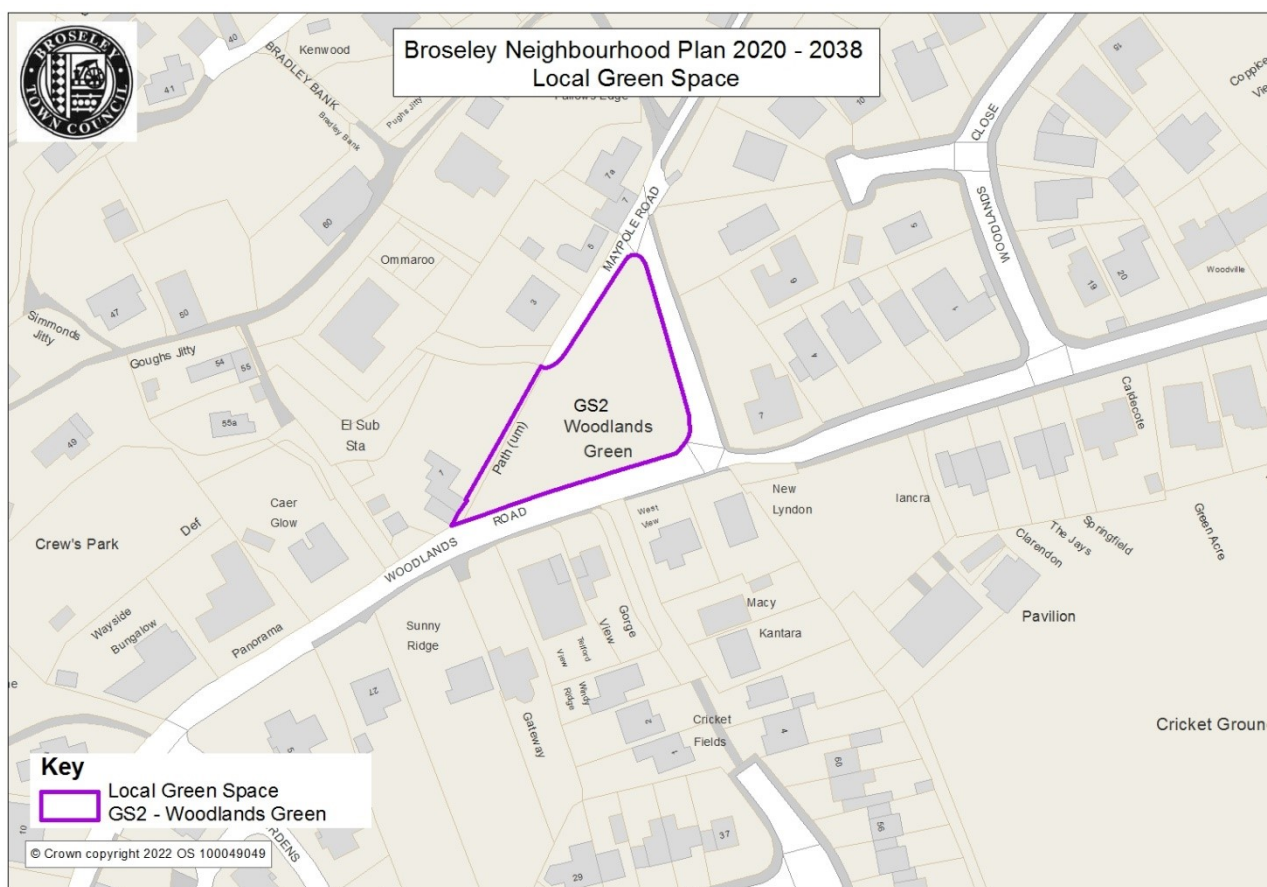
MAP CODE	SITE NAME	COMMENT		MATRIX SCORE
GS1	Ball Lane Fields	Extensive views north-west over Ironbridge Gorge to the Wrekin. Borders World Heritage Site		7
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
1	1	2	3	0



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.2: Woodlands Green Local Green Space

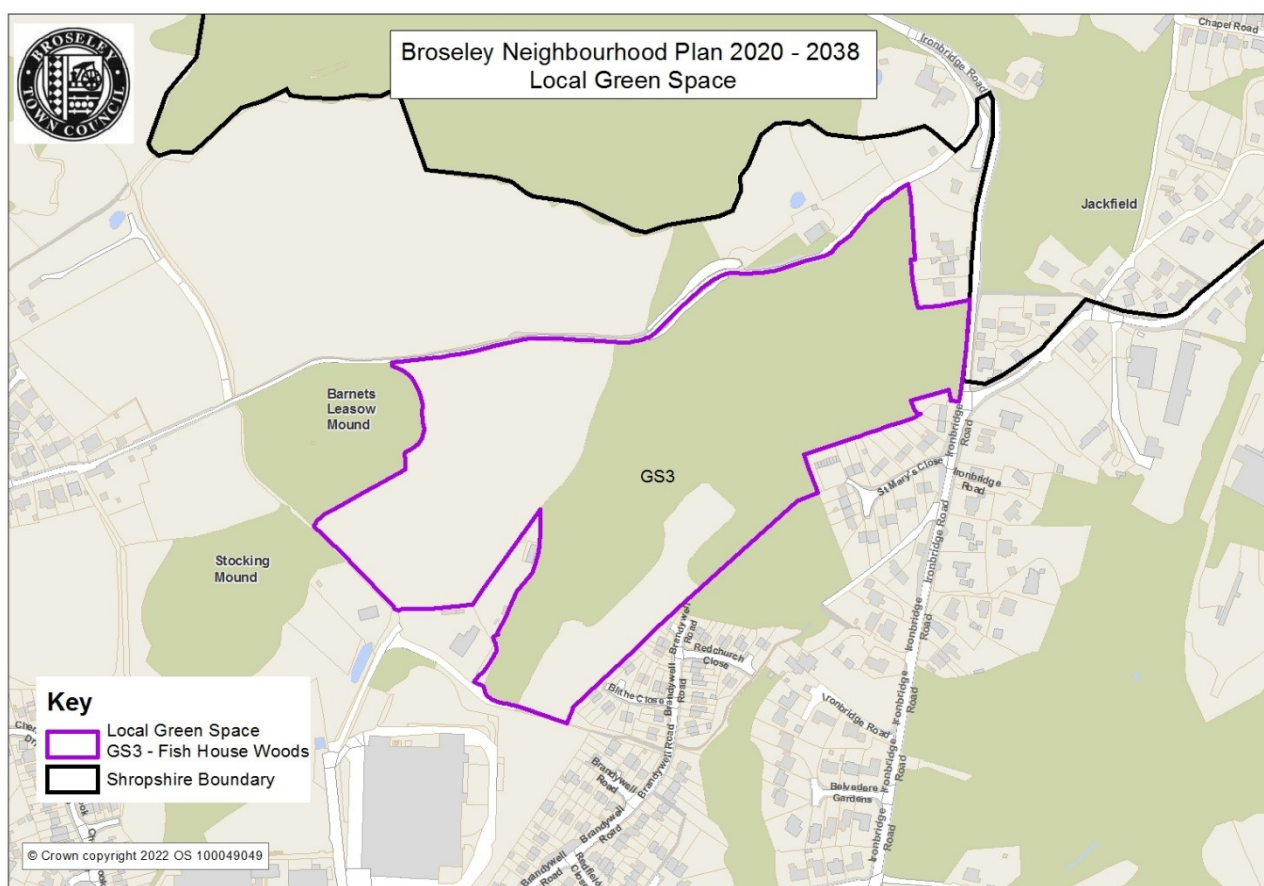
MAP CODE	SITE NAME	COMMENT		MATRIX SCORE
GS2	Woodlands Green	Extensive views north-west over Ironbridge Gorge to the Wrekin. Conservation Area		8
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
3	2	1	2	0



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.3: Fish House Woods Local Green Space

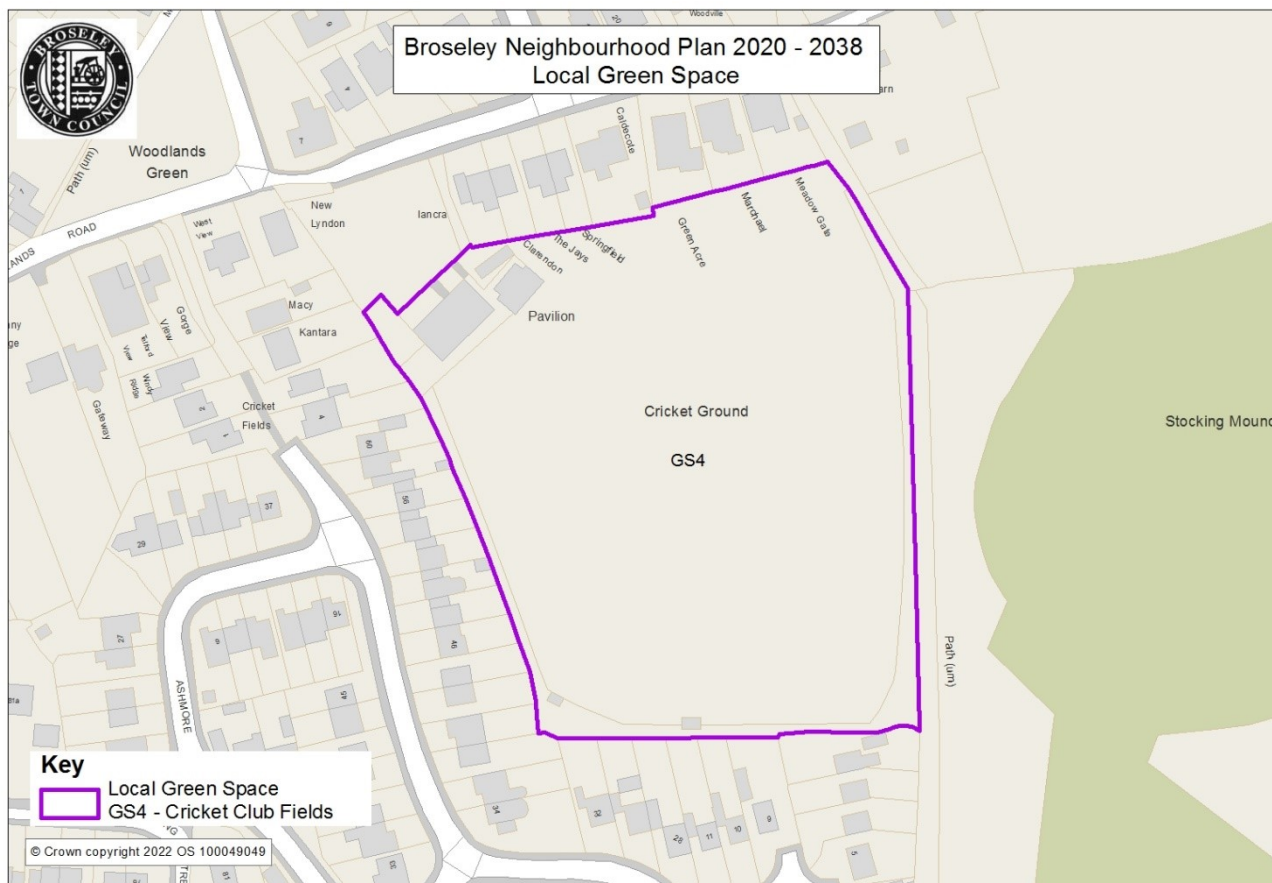
MAP CODE	SITE NAME	COMMENT			MATRIX SCORE
GS3	Fish House Woods	Privately owned mixed pasture and woodland with public footpath access. Borders World Heritage Site			6
MATRIX SCORES					
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation	
1	1	3	1	0	



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.4: Cricket Club Fields Local Green Space

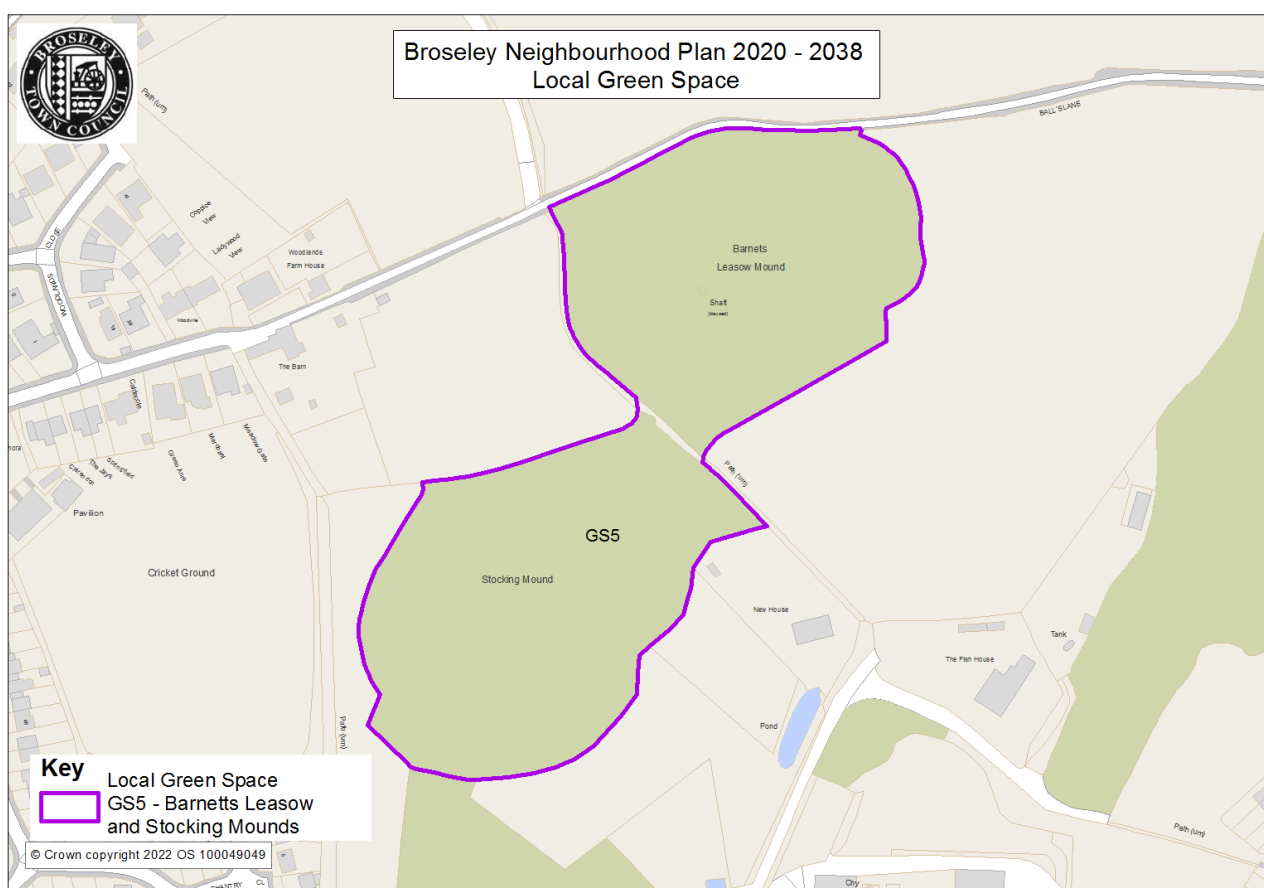
MAP CODE	SITE NAME	COMMENT			MATRIX SCORE
GS4	Cricket Club Fields	Recreational space			6
MATRIX SCORES					
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation	
1	0	1	1	3	



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.5: Stocking Mound & Barnetts Leasow Mound

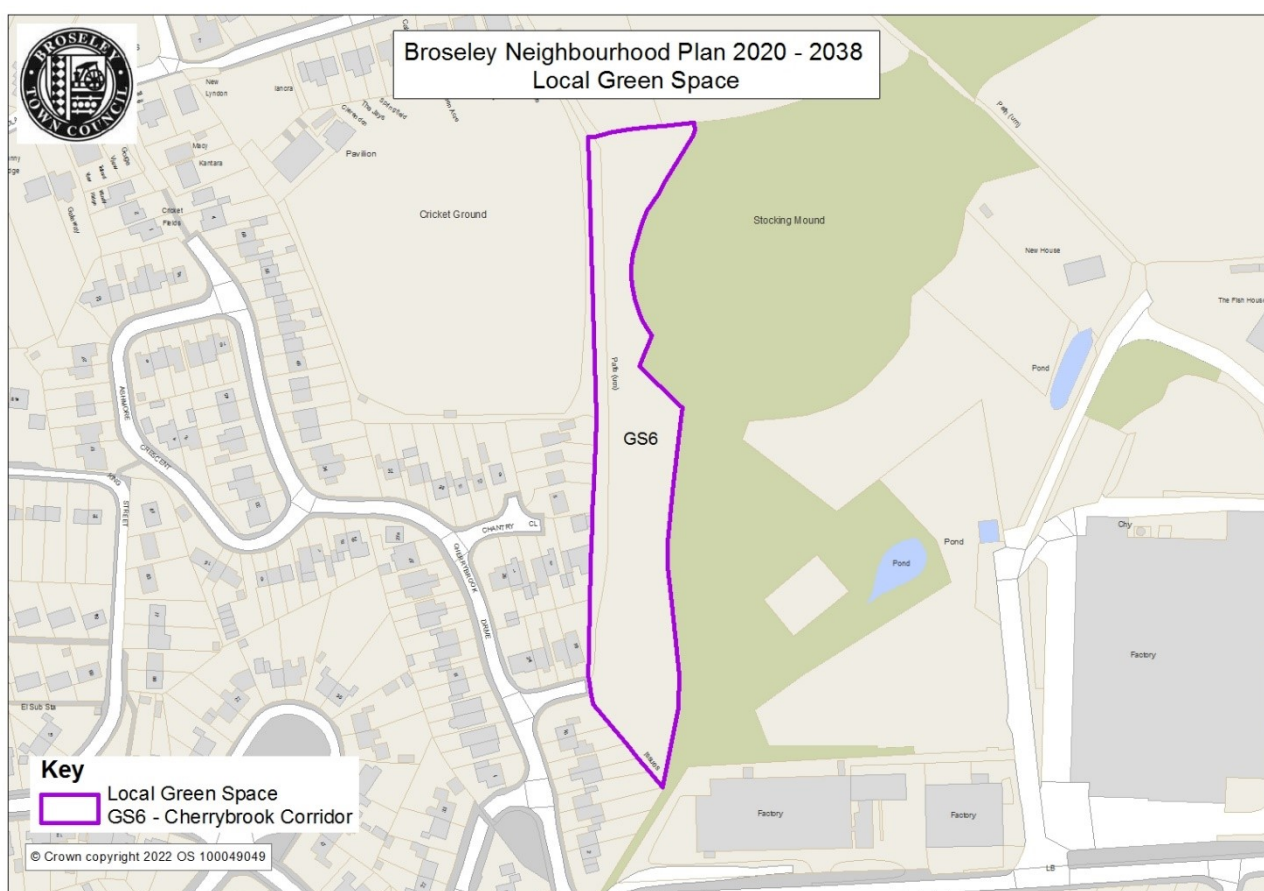
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS5	Stocking Mound & Barnetts Leasow Mound	The English Heritage Monument Protection Programme for the Iron Industry lists Barnetts Leasow and Stocking mounds as ‘The best preserved example of a typical c18th – early c19th iron mine’. This site is recorded on the Historic Environment Record as PRN 36861 and recommended for scheduling as a historic monument.	11	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
1	3	3	1	3



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.6: Cherrybrook Passage Local Green Space

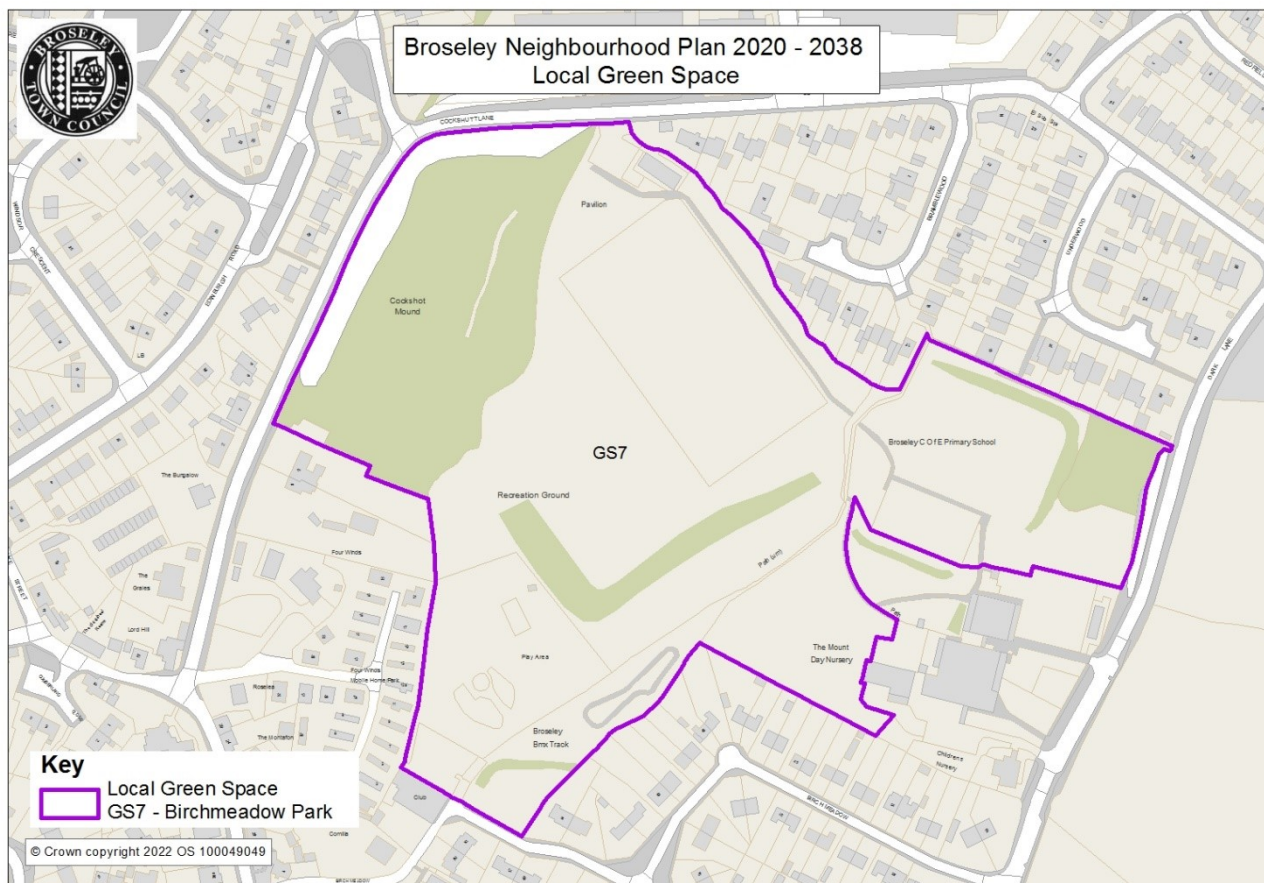
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS6	Cherrybrook Passage	A wildlife corridor, able to support diverse flora and fauna; three species of owls are known to frequent the small woodland. Borders the Stocking Mound site described in GS5	7	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
3	1	2	1	0



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.7: Birchmeadow Park Local Green Space

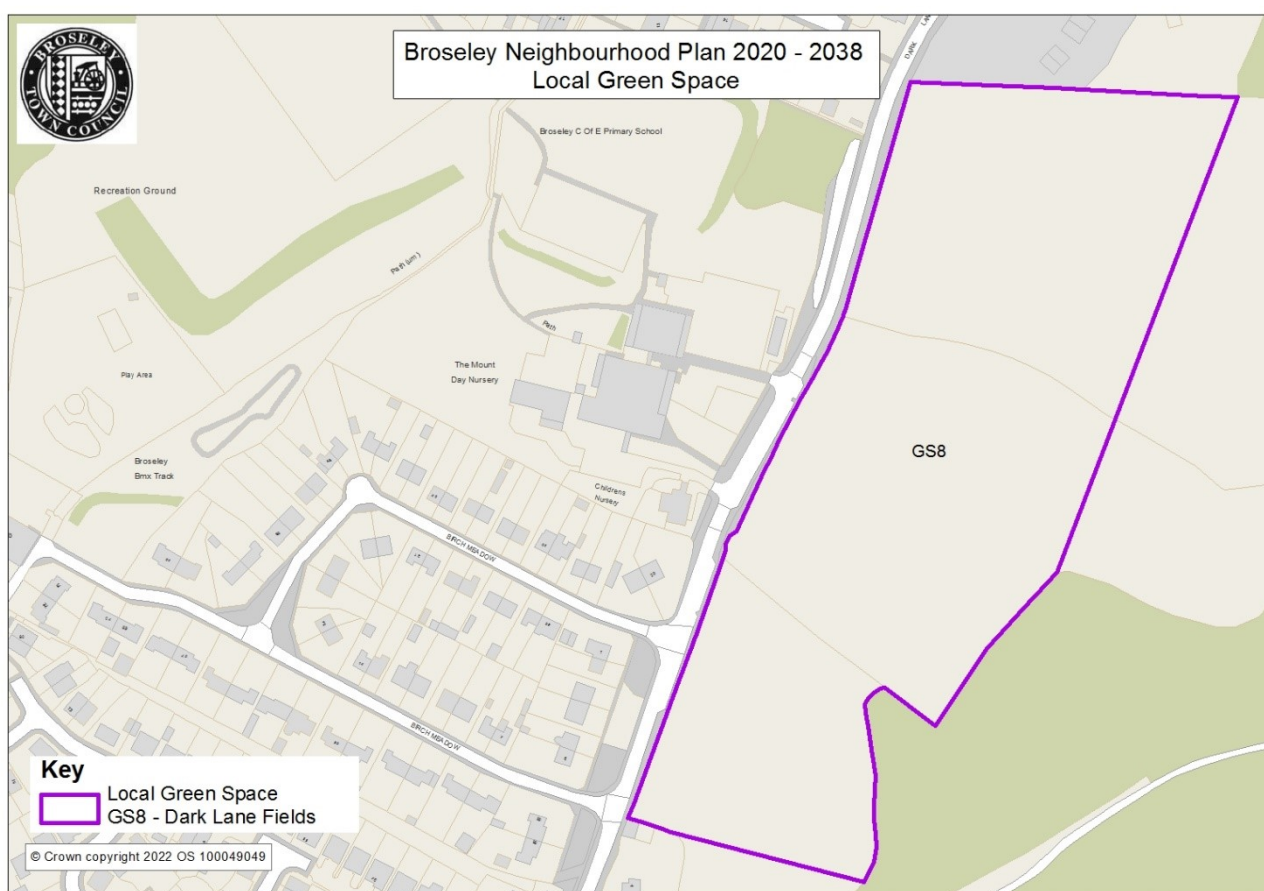
MAP CODE	SITE NAME	COMMENT			MATRIX SCORE
GS7	Birchmeadow Park	Recreational Space Fields in Trust			10
MATRIX SCORES					
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation	
3	2	1	1	3	



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Figure A3.8: Dark Lane Fields Local Green Space

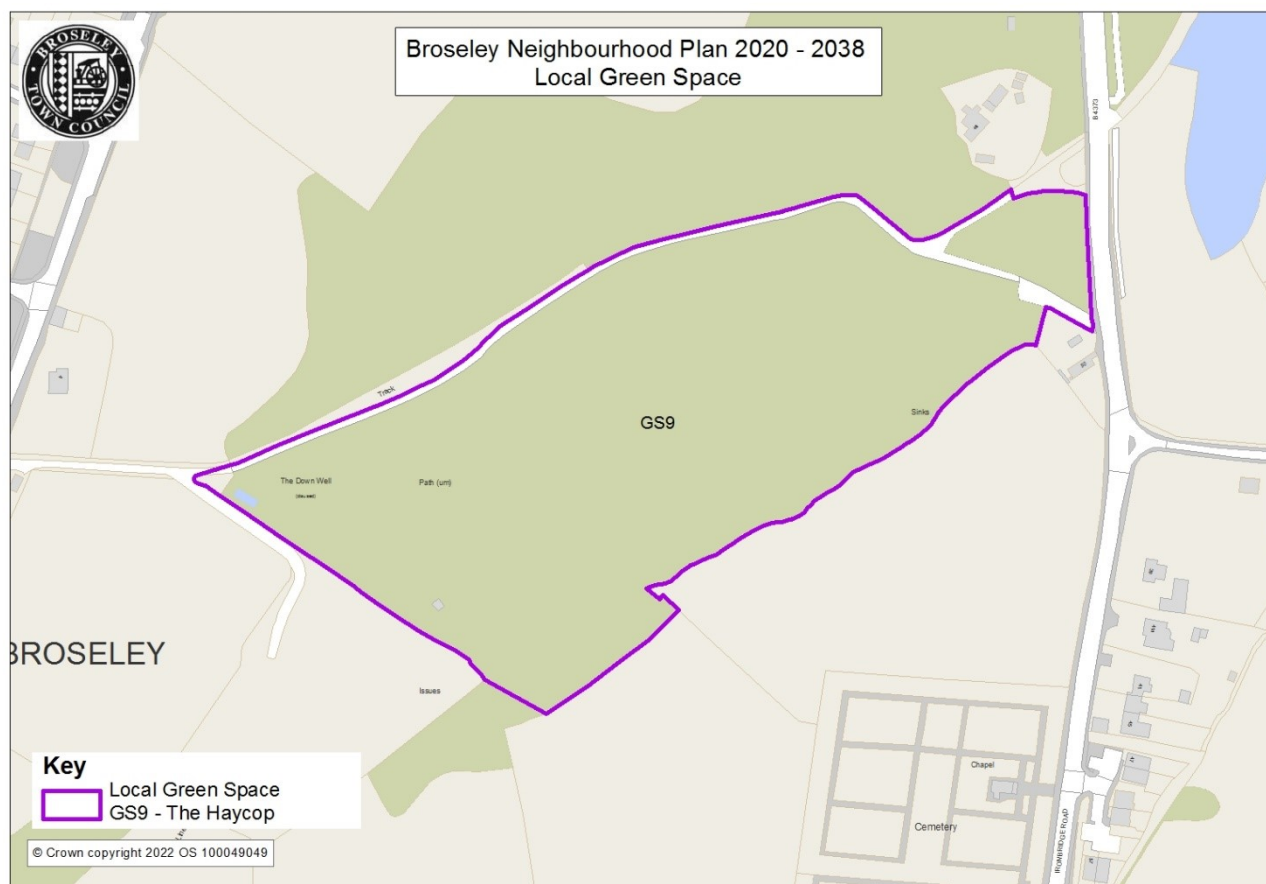
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS8	Dark Lane Fields	Open views over the Ironbridge Gorge to the whole of the West Midlands. Firs Field has the Trafalgar Firs, originally planted to commemorate the Battle of Trafalgar and replanted in the late C20th	6	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
0	2	1	3	0



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.9: The Haycop Local Green Space

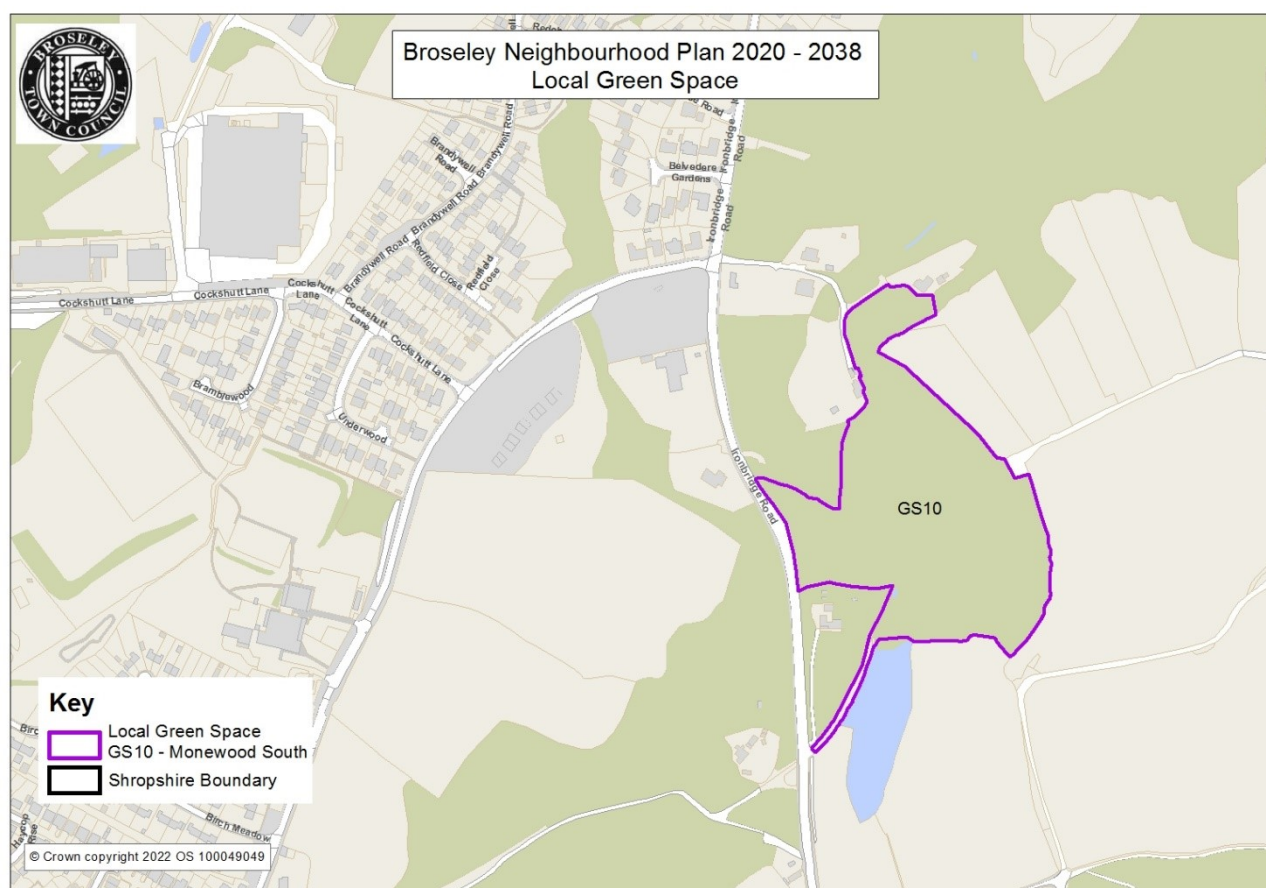
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS9	The Haycop	<p>The Haycop is mentioned in the C15th, taking its name from the enclosed piece (hay) of rough coppice (cop).</p> <p>Coal was extracted from the Haycop as early as 1760, brick and stone foundations of the pit winding drum pit still remain.</p> <p>The reconstructed Down Well on the site served as Broseley's water supply in the 1880s.</p> <p>The Haycop is currently managed as a nature reserve by a local volunteer group. It is designated as a Local Wildlife Site.</p>	15	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
3	3	3	3	3



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.10: Monewood South Local Green Space

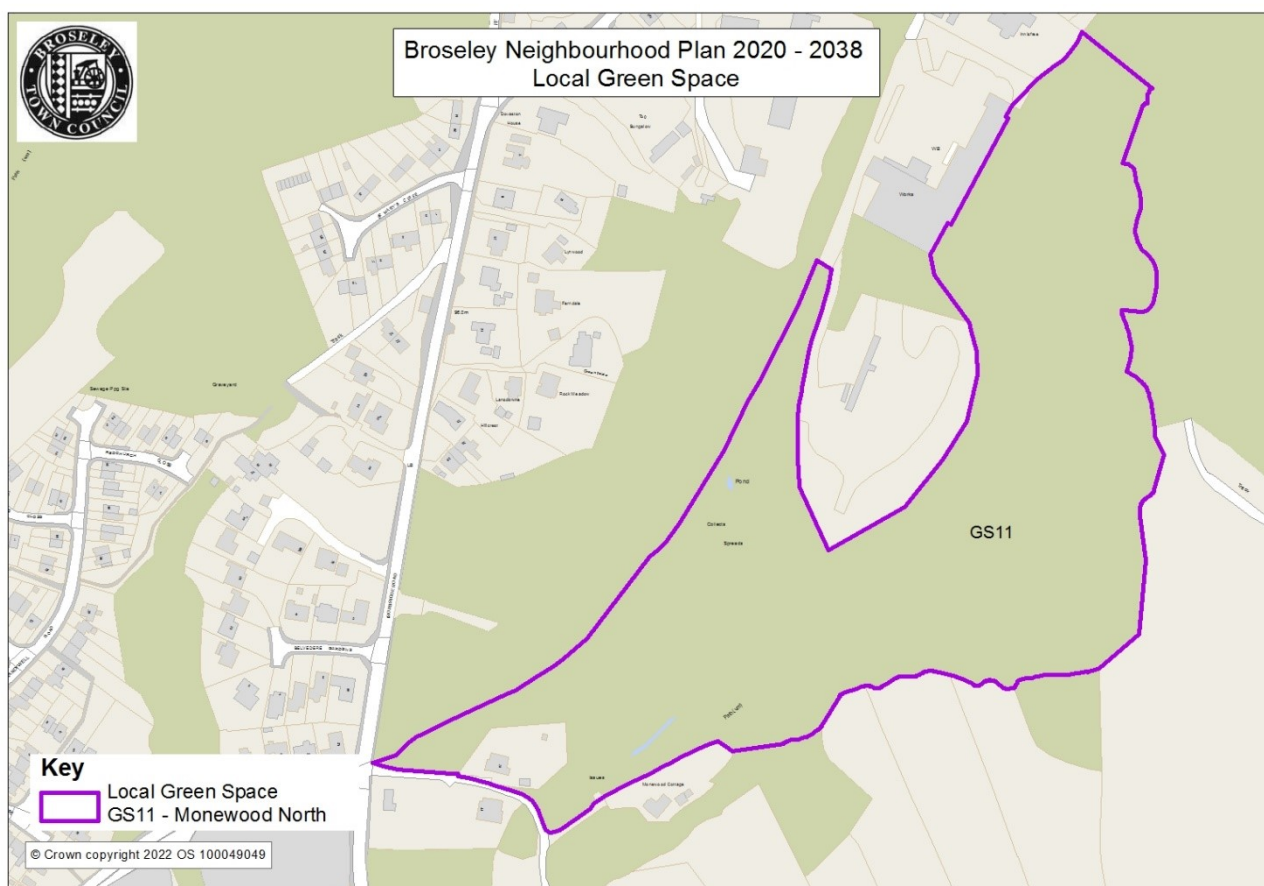
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS10	Monewood South	Monewood is recorded in 1605 and qualifies as ‘ancient woodland’. This area forms part of a green corridor running from the top of the Haycop Wildlife Site down to the Ironbridge Gorge.	8	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
2	2	3	1	0



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Figure A3.11: Monewood North Local Green Space

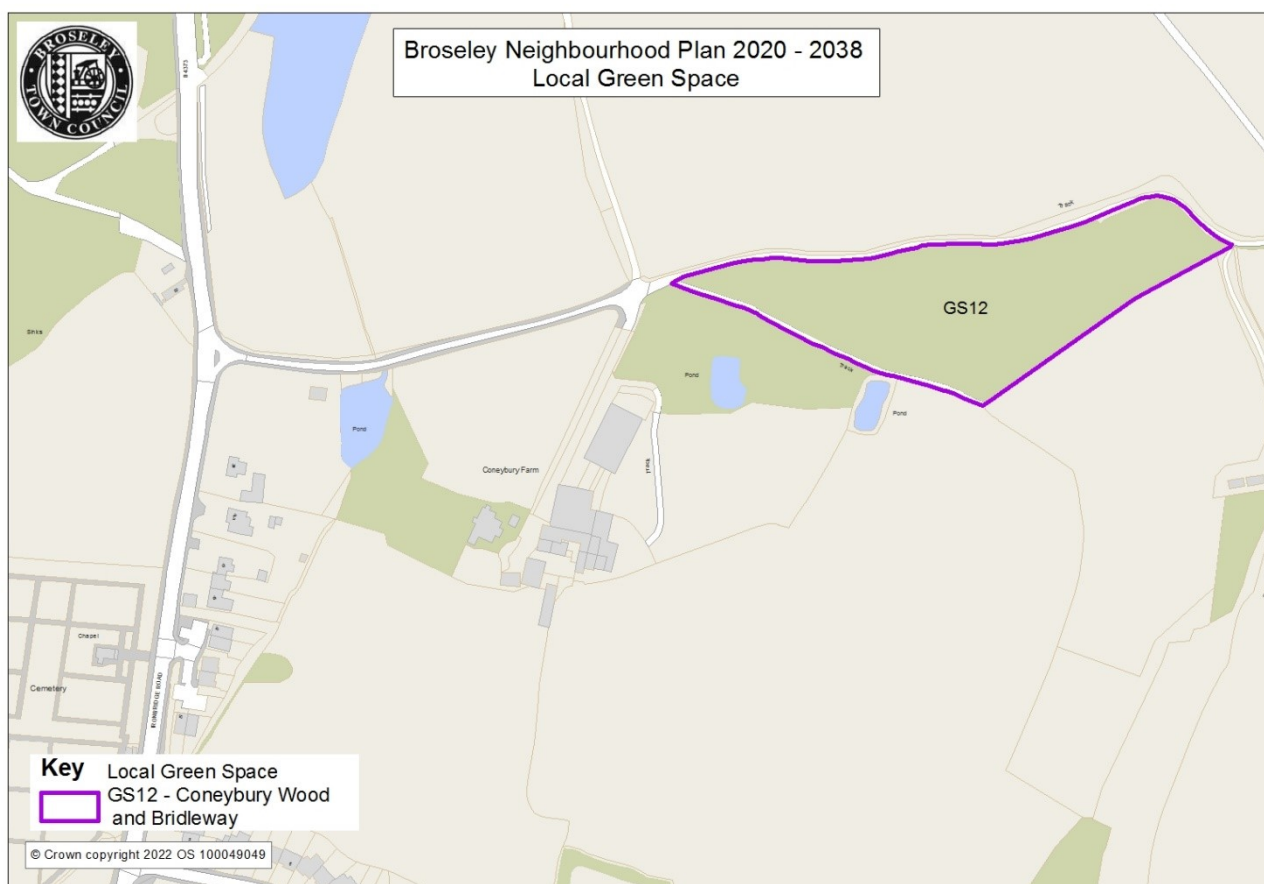
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS11	Monewood North	<p>Part of the World Heritage Site.</p> <p>Monewood is recorded in 1605 and qualifies as 'ancient woodland'.</p> <p>The early C18th Jackfield Rails ran through this areas as did the C19th Calcutts Rails. These would have been used for transporting coal and ironstone, initially being wooden railways and later iron tramways.</p>	11	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
2	2	3	1	3



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.12: Coneybury Wood and Bridleway Local Green Space

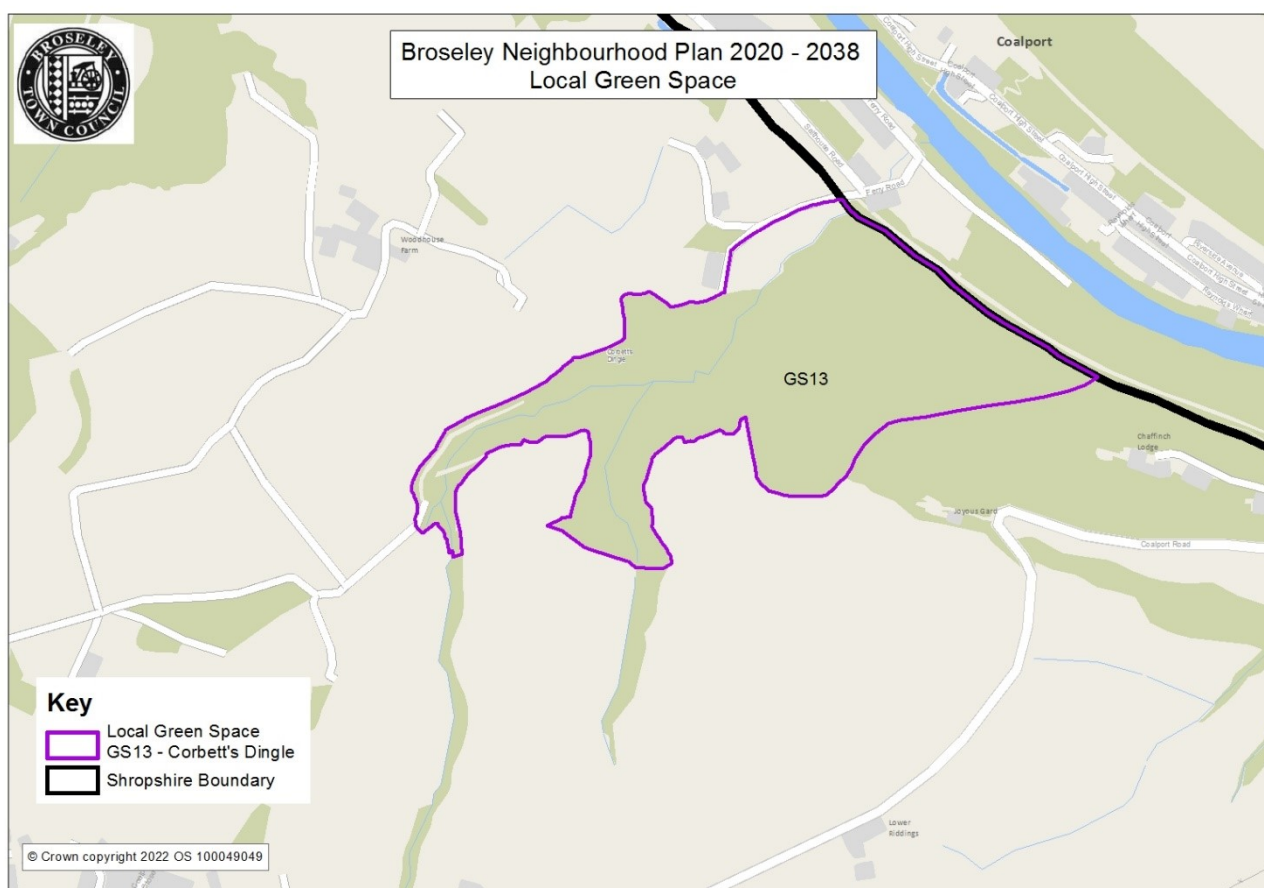
MAP CODE	SITE NAME	COMMENT		MATRIX SCORE
GS12	Coneybury Wood and Bridleway	Forms part of a natural green corridor running from Ironbridge Road to the River Severn.		6
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
2	0	3	1	0



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.13: Corbett's Dingle Local Green Space

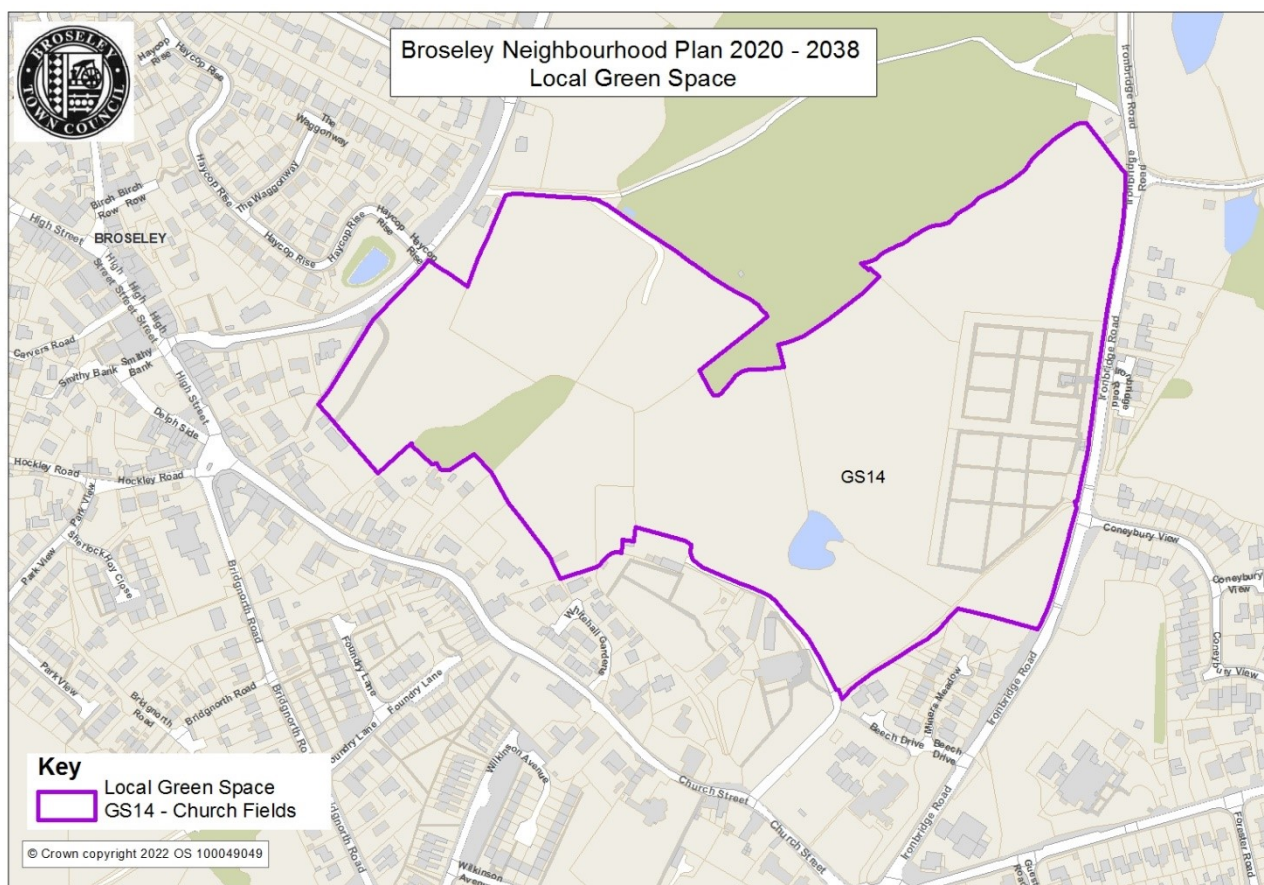
MAP CODE	SITE NAME	COMMENT		MATRIX SCORE
GS13	Corbett's Dingle	Part of the Ironbridge Gorge World Heritage Site. Corbett's Dingle is a valuable wildlife resource with locally rare plant species, three species of owl and geological features.		12
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
2	2	3	2	3



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.14: Church Fields Local Green Space

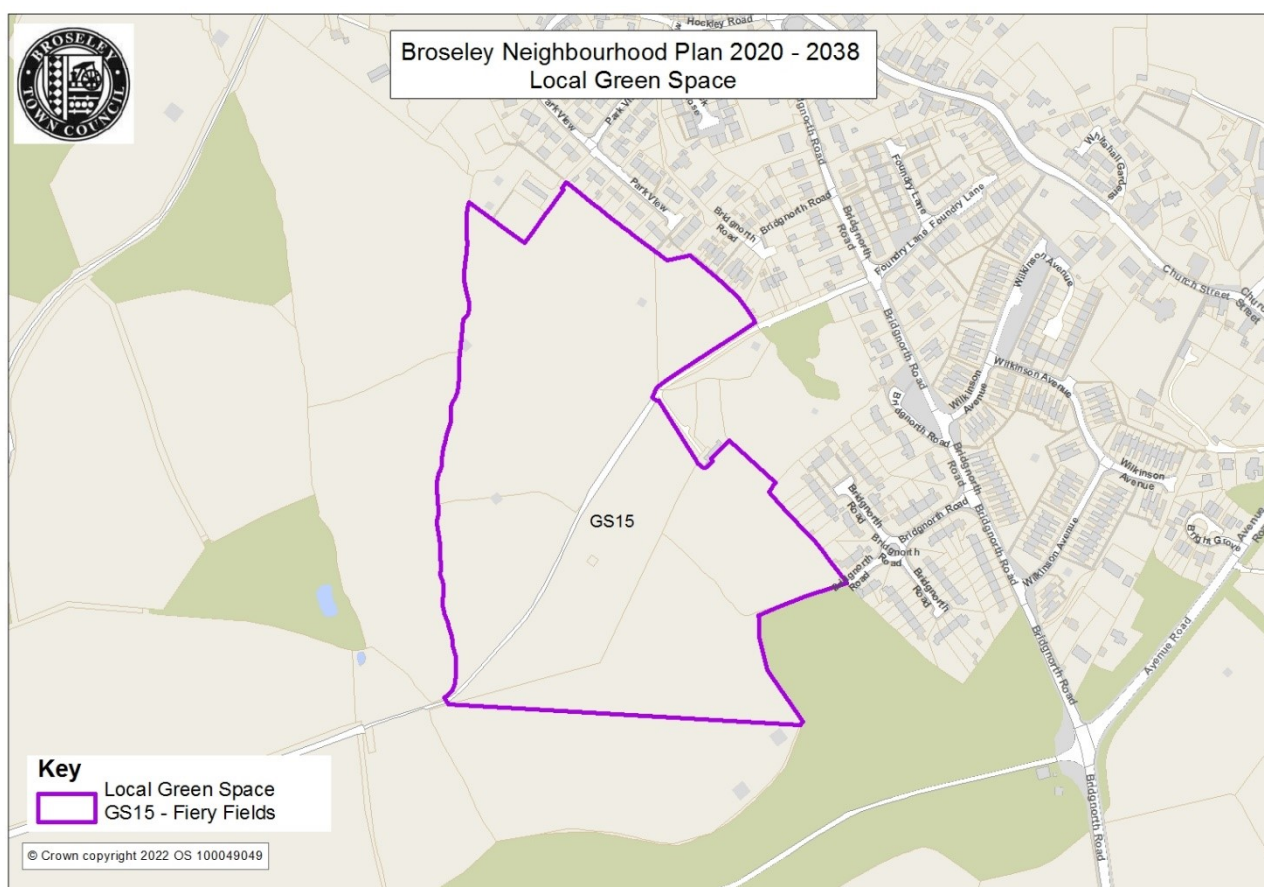
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS14	Church Fields	<p>The area bounded by the parish church, cemetery, The Haycop and Dark Lane is comprised of wet pasture.</p> <p>This area offers views from and to the Church and from Dark Lane over the Ironbridge Gorge.</p> <p>This area acts as a buffer zone for both the Conservation area and the Haycop wildlife site.</p>	5	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
0	1	1	3	0



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.15: Fiery Fields Local Green Space

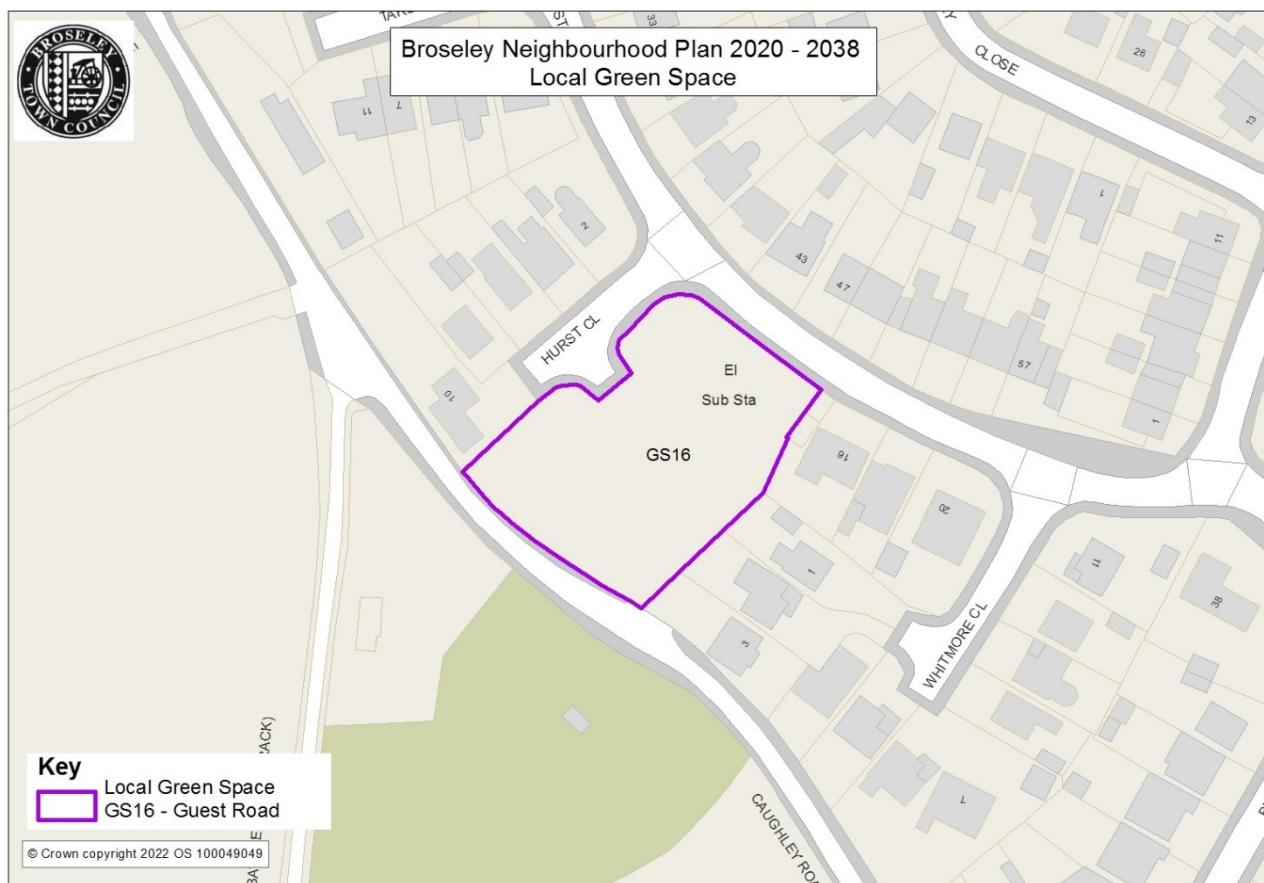
MAP CODE	SITE NAME	COMMENT	MATRIX SCORE	
GS15	Fiery Fields	<p>The Fiery Fields is a C16th and C17th mining areawith abundant evidence in the form of mounds and a capped pit head.</p> <p>The name itself comes from a spontaneous combustion in the c19th, when the coal below the surface of the fields burned for some months.</p> <p>The GS14 area encompasses a Local Wildlife site.</p>	12	
MATRIX SCORES				
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation
3	2	2	2	3



BROSELEY TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN 2020 – 2038

Figure A3.16: Guest Road Play Area Local Green Space

MAP CODE	SITE NAME	COMMENT			MATRIX SCORE
GS16	Guest Road Play Area	Recreational space / play area			6
MATRIX SCORES					
Public Access	Heritage Value	Environmental Value	Visual Amenity	Existing Designation	
3	0	0	0	3	



A full copy of the Local Green Space matrix, including the green space sites that were rejected, can be found on the Broseley Town Council website.

All of the Local Green Spaces are illustrated on Figure 3: Policies and Proposals Map.

Appendix Four

In 2018 Shropshire's site allocation process assessed potential in Broseley and selected two sites (Coalport Road and Barretts Hill) as 'preferred options' for development. Both of these preferred options were decisively rejected in public meetings.

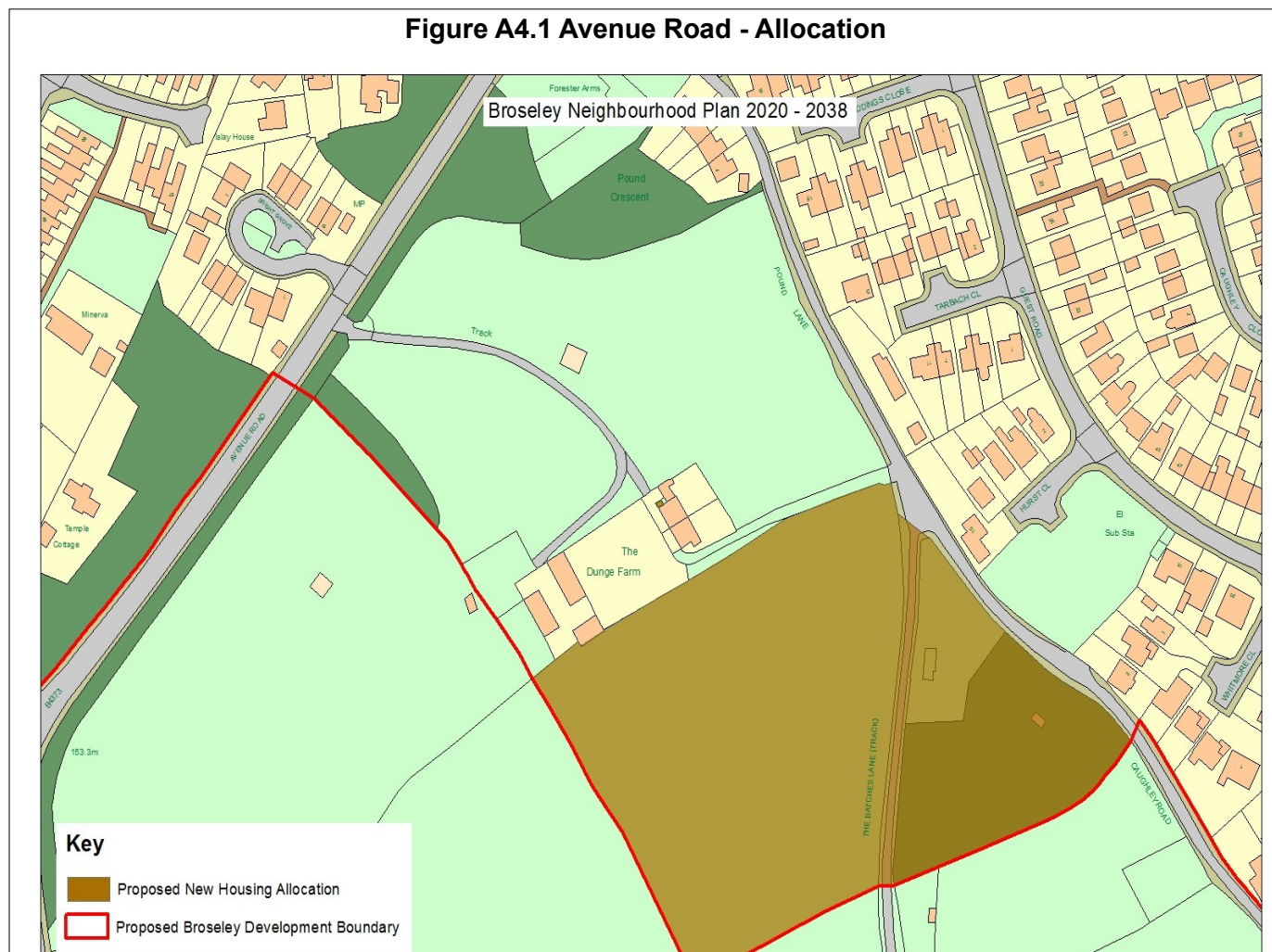
A parallel Neighbourhood Plan consultation narrowly accepted the Avenue Road site as a preferable option. This was confirmed in a later poll (See Consultation Statement) when a larger majority accepted this site as a 'mixed use' development option. The site was subsequently selected by the Neighbourhood Plan Advisory Group after conversations with the landowner.

Avenue Road Allocation

The development boundary will be changed in the south-east of the Town to include an area for new mixed development off Avenue Road (as shown in Figure A4.1).

This was selected for consideration because of its proximity to the Town Centre and preferred routes out of the Town. The 'mixed use' development category was chosen because of the existing and adjacent employment site.

Figure A4.1 Avenue Road - Allocation



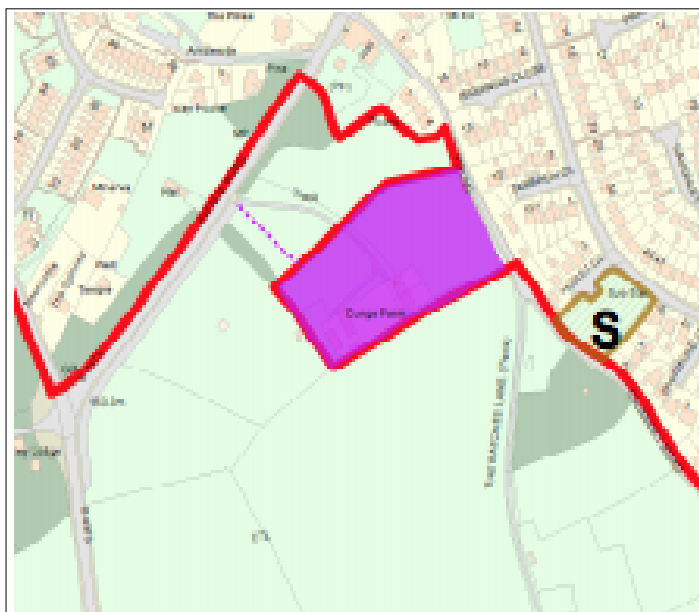


Figure A4.2 Red Line = Local Plan Development Boundary

This new allocation of 1.9 hectares lies to the south of the existing employment area (as shown marked in purple on Figure A4.2) and a development with current planning permission which itself incorporates the previous employment site (Figure A4.3).

Access to the new allocation will be via Avenue Road, through the employment area of the new development shown in Figure A4.3. Access will not be via Pound Lane.

The new development will be classed as 'mixed use' and restricted to 20 dwellings.

This site formed part of a larger block that was assessed by Shropshire Council as part of its site allocations consultation in 2018 (site reference BRO036). At the time the assessment rejected the larger block, largely because of the presumed access. This assessment recognised that development to the north of the site would materially affect the judgement. Development as described has now been given planning permission (16/02438/REF) and thus the access restrictions no longer apply.

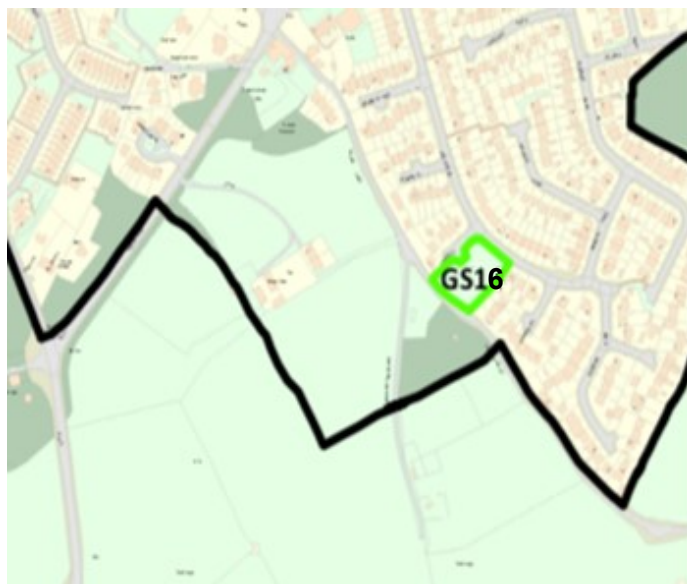
The same landowner owns both sites, and has been consulted about the development allocation.



Figure A4.3 (16/02438/REF) granted on appeal

Site Development Criteria

Figure A4.4 Black line = proposed development boundary



Proposals for development on this site should meet all the following criteria:

1. Access to be from the B4373 via the employment site as shown in Figure A4.3 above. Due to this access through an existing development, the number of units is restricted to 20. Alternative access from the B4373 near the Barrow Junction would allow additional units at a future date, if demand could be demonstrated at the time.
2. Separate pedestrian access to Pound Lane to be provided;
3. Mature trees and hedges to be retained where possible;
4. An area of Japanese Knotweed in the woodland to the south east of the allocation to be safely removed prior to any development;
5. Any application for development should be accompanied by a Heritage Assessment

to investigate and assess the eastern portion of the site. This area may have formed part of The Dunge Brick and Tile Works (HER PRN 07237) and the associated Dunge Colliery and associated coal workings (HER PRN 07285).

6. Development to provide around 20 homes

7. Development to be informed by an assessment of any coal mining legacy risk

The Broseley development boundary will be moved out to encompass this new allocation and the development proposed (as December 2020 not started) as set out in planning application 16/02438/REF.

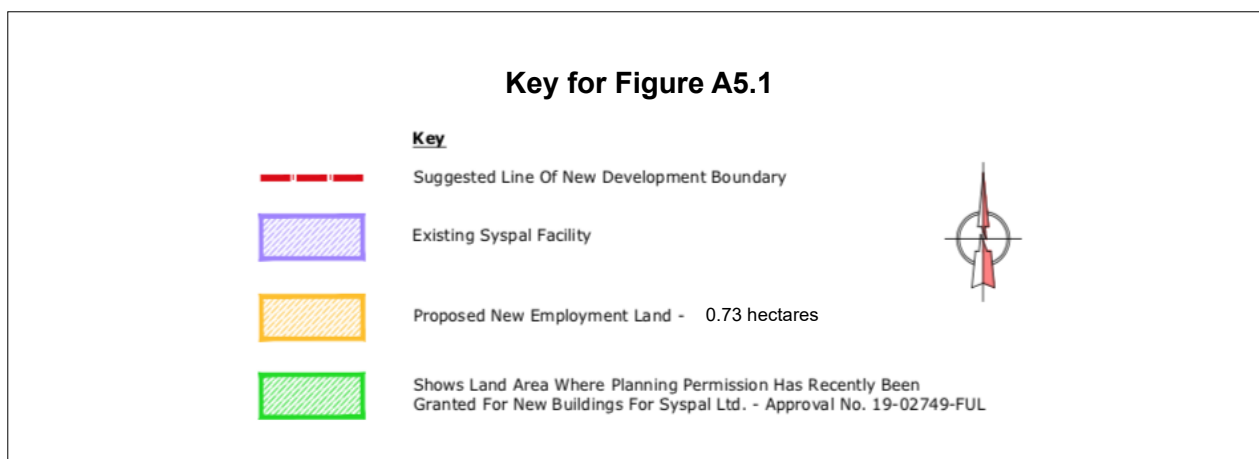
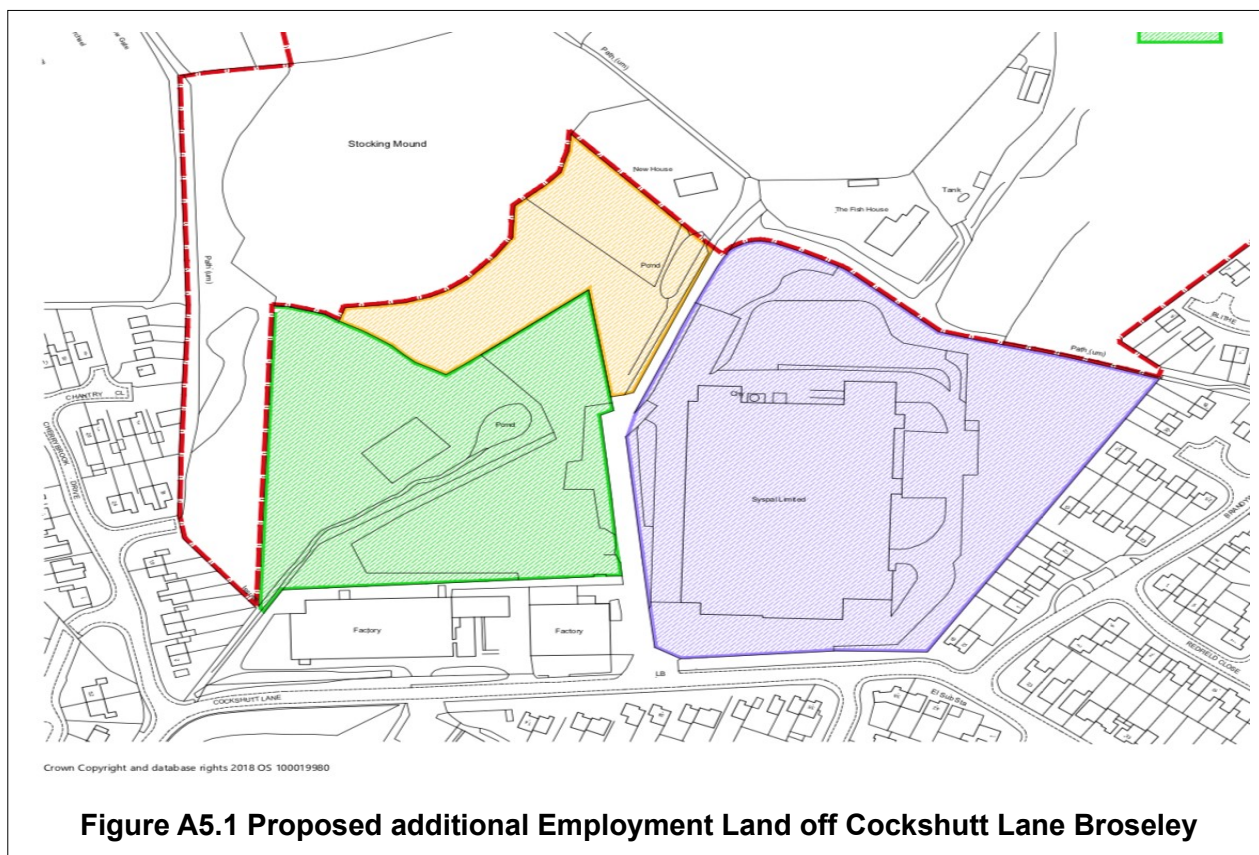
Appendix Five

Employment Land Allocation

Over the period 2016-2038, as set out by Shropshire's Local Plan, 3 hectares of employment land are required in Broseley.

This Neighbourhood Plan intends to meet this requirement via its employment policies as set out in the main document, specifically paragraphs 4.16 to 4.23 and Policy EJ3.

A new allocation of 0.73 hectares of employment land will be sited off Cockshutt Lane as set out in Figure A5.1.



Background

Syspal are the main manufacturing employer in Broseley. In 2019 permission was granted (19/02749/FUL) for an extension to their existing site.

The extended site (shown in green in Fig A5.1) occupies the site of a previous employment site used for scrap metal recovery.

There were a number of issues with the site and proposal that were addressed in detail by Shropshire Council officers as part of the application process.

After planning permission had been granted advisory group members met with Syspal to review issues that had been raised during the application process. The request to consider a further enlargement of the development boundary arose out of those discussions.

Reasoning

This new allocation is being made to support employment growth in Broseley.

The site chosen is adjacent to and will form part of an existing employment site. Whilst there is close proximity to a heritage site and to 'valued green space' the Town Council believes that the issues addressed in the planning proposal made in 2019 are substantially the same and that similar management of the development would mitigate the impact on the environment and community.

Site Development Criteria

The new boundary and employment land allocation lies to the north of the factory extension given planning permission by Shropshire Council in 2019. The land is in the same ownership - Syspal Ltd. - who have promoted the land as an employment site to Broseley Town Council.

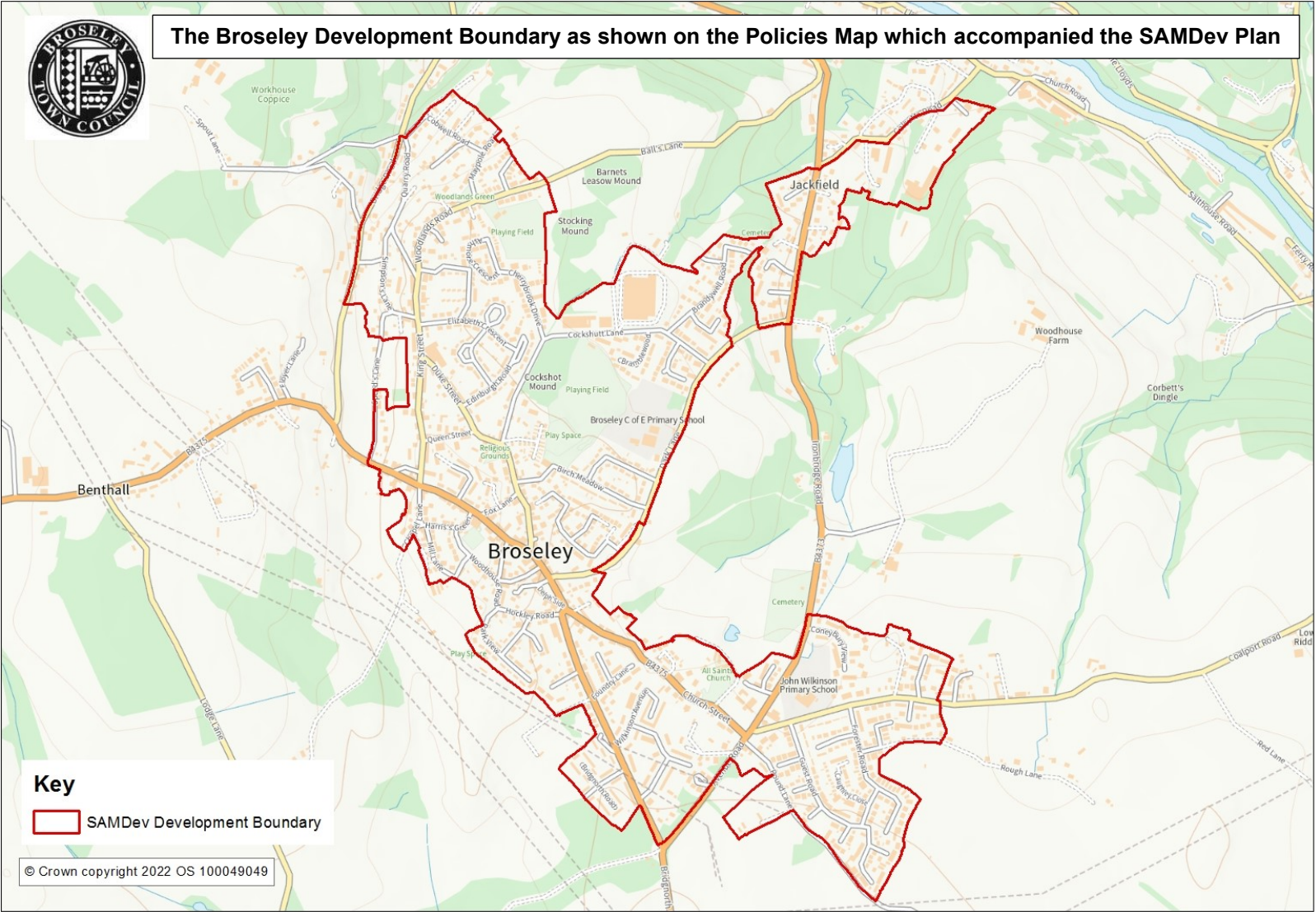
This is an employment land allocation; proposals for market housing will not be supported on this site.

Proposals for development on this site should meet all the following criteria:

- 1) Access will be via the existing access point off Cockshutt Lane.
- 2) All development proposals should be accompanied by appropriate assessments of their impact on heritage, wildlife and trees.
- 3) Protect the pond on the allocation and its associated watercourses, which should not be culverted;
- 4) Include a suitable buffer zone to avoid encroachment on the bordering heritage site;
- 5) Ensure continued access for the residential properties at the end of Wilkinson Avenue;
- 6) Ensure continued access from Cockshutt Lane to the footpath from Brandywell Road to Balls Lane via Barnett's Leasow Mound.

Appendix Six

Figure A6.1: The Broseley Development Boundary as shown on the Policies Map which accompanied the SAMDev Plan



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