

# Appendix B.4. Shropshire Council- Local Plan Review- Preferred Sites Consultation

Broseley

Shropshire Council

28 May 2019

# Notice

This document and its contents have been prepared and are intended solely as information for Shropshire Council and use in relation to the summarising and analysis of consultation responses to the recent Preferred Sites Consultation and to provide a number of key deliverables to support the Council in moving forward the review of the Local Plan.

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This document has 12 pages including the cover.

## Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
Rev 1.0	Draft Broseley	VD	KD	BN	VD	25 <sup>th</sup> April 2019
Review 2.0	Final Broseley	VD	BN	VD	VD	29 <sup>th</sup> May 2019

## Client signoff

Client	Shropshire Council
Project	Shropshire Council- Local Plan Review- Preferred Sites Consultation
Job number	5188227
Client signature / date	

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# Introduction

Following approval from Cabinet on the Shropshire Council Preferred Sites Consultation, consultation documents for this third stage of the Local Plan Review were published on 29th November 2018 and the consultation ran till the 9<sup>th</sup> February 2019.

This stage of consultation sought views from all parties on the Preferred Sites Consultation in Shropshire for the period 2016-36.

Specifically, the consultation sought views of all parties with an interest in the preferred development strategy and sites in these identified locations, so that relevant views and evidence can be taken into account in deciding the best way forward. The Consultation Document:

- Outlines a housing policy direction to improve the delivery of local housing needs;
- Establishes development guidelines and development boundaries for Shrewsbury, Principal and Key Centres and each proposed Community Hub;
- Sets out the preferred sites to deliver the preferred scale and distribution of housing and employment growth during the period to 2036;

These responses will be used to inform further development of the Local Plan Review. This document summarises the key issues raised by respondents to the consultation in the Broseley Place Plan area.

# 1. Overview

This report provides a summary of the consultation comments received in response to the Broseley Place Plan Area-specific questions posed as part of the Shropshire Council Local Plan Review Preferred Sites Consultation.

The following sections set out the analysis of the qualitative comments from the consultation. Questions 3 and 4 sought views on the delivery of local housing needs, questions 5 and 6 sought views on windfall development. The key issues and concerns raised in response to these questions by consultees that responded to Broseley-specific questions are summarised in Sections 2 and 3.

There were four questions specifically relating to the Broseley Place Plan Area, the responses to these questions are summarised in Section 4. Section 5 summarises the other comments raised by consultees that responded to Broseley-specific questions.

A total of 49 consultees responded to these questions.

The quantitative analysis of these comments is set out in Appendix A.

## 2. Delivering Local Housing Needs

### 2.1. Question 3

Question 3 sought views on whether respondents thought that Shropshire Council should introduce a cross-subsidy exception site policy allowing an element of open market housing to support the delivery of affordable housing. Responses to this question by respondents, who were interested in the Broseley Place Plan Area, demonstrated a mix of supported and opposed the policy. Respondents made the following relevant comments:

- They would like to see the policy adopted where existing policy had been unable to deliver 100% affordable housing.
- General support for the exception policy.
- The need for community agreement in these types of situations.

### 2.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment) if development mix should be assessed on a site by site basis or a set development mix, which would be geographically defined and subject to the findings of a viability assessment undertaken as part of the Local Plan Review. Responses to this question by respondents, who were interested in the Broseley Place Plan Area, tended to favour a development mix on a site by site basis. Respondents made the following relevant comments:

- They would like to see the policy adopted where existing policy had been unable to deliver 100% affordable housing.
- Importance of assessing viability and ensuring that the developer earns profit.
- Assessing site by site would allow the appropriateness of a mix to be considered in each location.
- Low cost properties should be offered to local residents in Broseley first.

## 3. Windfall Development

### 3.1. Question 5

Question 5 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines. Over half of the respondents, who were interested in the Broseley Place Plan Area, supported a windfall allowance for housing. Respondents made the following relevant comments:

- Respondents believe that windfall development has and will continue to contribute to new housing development in Broseley. Windfall should be weighted to give a realistic assessment of its contribution within each community.
- Appropriate for this windfall allowance to accord with the 'Urban Focus' strategy that seeks to focus growth around Shrewsbury, the Strategic Centre, the Principal Centres and the Key Centres rather than the rural areas.
- There was a call to increase the Windfall allowance in light of the unmet housing need from Greater Birmingham and the Black Country in Strategic Centre, the Principal Centres and the Key Centres, like Broseley.
- There is concern about how the Council have identified windfall allocations and lack of definition about how close a windfall site should be to the settlement.

### 3.2. Question 6

Question 6 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines. The majority of respondents, who were interested in the Broseley Place Plan Area, supported an employment windfall allowance. Respondents made the following relevant comments:

- If there is evidence this policy should progress.
- More employment opportunities are needed for local people.

## 4. Broseley Place Plan Area

### 4.1. Question 16 (a)

Question 16 (a) sought views on whether respondents agreed with the preferred housing and employment guidelines for Broseley. There was a mix of views, but approximately half of respondents stated they did not know or had no opinion. Respondents made the following relevant comments:

- Some consultees were content with the overall target for housing numbers but do not agree with how the guideline will be met.
- Questions are raised over the employment allocations considering the existing employment allocation remains undeveloped and the emergence of new larger sites in the wider area (e.g. Ironbridge Power Station) located closer to infrastructure.
- Others argued that there should be a higher proportion of development in this Key Centre due to Broseley's location in proximity to Birmingham and the Black Country, highlighting its sustainable location in the county.
- A respondent argued that growth should not be restricted, but should continue at a sensible rate and that other Key Centres have proportionally larger allocations without any explanation for these allocations.
- There is a need for provision of associated infrastructure/public services, namely; schools, communication infrastructure, road and public transport infrastructure, as well as employment opportunities.
- Housing targets are above housing need and should be reduced by 10% in Broseley. Furthermore, existing employment land is adequate based on scaled back housing guideline. Existing imbalances should be included in calculations for housing and employment guidelines.
- There is no demand for large 4&5 bedroom properties, however there is demand for affordable housing and smaller dwellings for young local people.

### 4.2. Question 16 (b)

Question 16 (b) sought views on the proposed development boundary for Broseley. There was a mix of views on the proposed development boundary. Respondents made the following relevant comments:

- Some suggested minor revisions to the development boundary to include additional housing, highlighting that development should be of a small scale and adjacent to the boundary. There is a belief that small sites should be considered over larger sites.
- Respondents promoting alternative sites suggested the extension of the development boundary to include their sites, generally to the east of Broseley.
- Others did not agree with the development boundary due to significant intrusion into the countryside.
- Some thought the development boundary was drawn too tightly and it would be logical to realign the development boundary to include areas that lie immediately adjacent even if they were in Benthall Parish.
- The methodology for the development boundary was questioned, as was the lack of flexibility for future development as windfall sites, and the lack of encouragement for sustainable urban-focused growth.
- A concern for some was the lack of flexibility in the proposed boundary to deal with changing circumstances.
- Contaminated land issues should be considered as historic landfills are located within the proposed development boundary.
- Opposition was raised concerning the inclusion of the lower part of the Monewood Valley for both housing and employment sites as this is an important green corridor route for wildlife and is the only off-road link between the town centre and Jackfield, Ironbridge, Coalport and the River Severn.
- One Consultee stated support for the proposed boundary, although it should not extent further west than it currently does due to presence of Penn's Meadow Local Wildlife Site.

### 4.3. Question 16 (c)

Question 16 (c) sought to confirm whether respondents agreed with the preferred housing allocation BRO012/BRO024 in Broseley. Most respondents did not know or had no opinion. Respondents made the following relevant comments:

- Generally, there were concerns about access, parking, road safety impact on 'green corridor' and the type of housing was out of character with the area.
- One Consultee stated that the proposed development impacts the Conservation Area and Penns Meadow.
- There is no demand for large 4&5 bedroom properties and the access is dangerous.
- Coal Authority indicated that a site investigation will be required in respect of historic coal mining and ground stability.

### 4.4. Question 16 (d)

Question 16 (c) sought to confirm whether respondents agreed with the preferred housing allocation BRO040/BRO041 in Broseley. More than half of respondents did not know or had no opinion. Those opposed outweighed the number of respondents who supported the allocation. Respondents made the following relevant comments:

- Generally, most comments related to the refusal of a planning application and planning appeal on this site, noting that reasons for the refusal remain valid. Particular concerns included loss of green space, access, traffic issues, highway safety and surface water.
- Coal Authority indicated that a site investigation will be required in respect of historic coal mining and ground stability.
- Impact on the character of the area and wildlife was also cited as an issue with this proposed allocation, with alternative sites in the centre of Broseley suggested as being more sustainable, including brownfield options and BRO038.
- One respondent highlighted issues of previous mining at this allocation and the need for other alternatives.
- Continued lack of affordable housing in Broseley.
- The development would have landscape impacts across the area and visual impacts for tourists and walkers.

- The existing road infrastructure is insufficient and there are more appropriate sites available including more mixed development off Avenue Road.
- Supporters of the site suggested that it would make a significant and sustainable contribution towards the overall housing guideline for Broseley.

## 5. Further Information

### 5.1. Question 63

Question 63 sought views on whether respondents thought any additional 'Community Clusters' to those identified within the Preferred Sites Consultation should be formed or any of the existing 'Community Clusters' identified in the consultation document should be removed. Most respondents, who were interested in the Broseley Place Plan Area, stated that they did not agree with any need to add or remove clusters.

Respondents made the following relevant comments:

- The area in the north and west of Broseley considered in Question 16 (b) should be allocated as a Community Cluster.
- The basis on which Community Clusters are allocated needs to be re-thought, with much greater weight being placed on sustainability rather than wishes of local interest groups.
- The following comment was provided, but relates to sites rather than 'Community Clusters' It states that reference to sites opposite Dark Lane, Farry Field and Bridgnorth Road were not mentioned.

### 5.2. Question 64

Question 64 sought any other views. Where suitable, responses to this question have been consolidated into the relevant Broseley-specific questions. Respondents to the question, who were interested in the Broseley Place Plan Area, made the following relevant comments:

- Several respondents took this opportunity to promote sites other than those preferred in Broseley.
- Comments about lack of affordable housing, the number of houses proposed being too high and the proposed sites not contributing to meeting the affordable need or windfall allocations.
- Others highlighted the need for smaller housing schemes as highlighted through the Neighbourhood Plan process.
- A number of respondents referenced policy, including the NPPF, highlighting that local character and aesthetics must be considered and large sites may not meet that criteria. Others highlighted the potential impact urbanisation of Broseley could have on the character, environment and residents of Broseley.
- Potential for a Garden Village style development, which is sensitive to environmental benefits, residential requirements, exercise and tourism.
- Consultees suggested the Local Plan Review should capitalise on the tourism industry considering the proximity of Ironbridge Gorge World Heritage Site.
- One respondent commented on the inadequacy of the consultation, in particular timescales for comments.



# Appendices



# Appendix A. Quantitative Analysis.

This appendix details the responses provided to the multiple choice questions posed for the Broseley Place Plan Area.

## A.1. Question 3

Question 3 sought views on whether respondents thought that Shropshire Council should introduce a cross-subsidy exception site policy allowing an element of open market housing to support the delivery of affordable housing. Of the unique respondents that responded to this question, who were interested in the Broseley Place Plan Area, and completed this question:

- 39% agreed with the introduction of a cross-subsidy exception site policy;
- 39% did not agree with the introduction of a cross-subsidy exception site policy; and
- 22% don't know/ no opinion on the introduction of a cross-subsidy exception site policy.

## A.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment) if development mix should be assessed on a site by site basis or a set development mix, which would be geographically defined and subject to the findings of the findings of a viability assessment undertaken as part of the Local Plan Review. Of the unique respondents that responded to this question, who were interested in the Broseley Place Plan Area, and completed this question:

- 73% preferred a development mix to be assessed on a site by site option;
- 27% preferred a set development mix option.

## A.3. Question 5

Question 5 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines. Of the unique respondents that responded to this question, who were interested in the Broseley Place Plan Area, and completed this question:

- 63% agreed that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline;
- 5% did not agree that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline; and
- 32% don't know/ no opinion that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline.

## A.4. Question 6

Question 6 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines. Of the unique respondents that responded to this question, who were interested in the Broseley Place Plan Area, and completed this question:

- 56% agreed that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline;
- 11% did not agree that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline; and
- 33% don't know/ no opinion that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline.

## A.5. Question 16 (a)

Question 16 (a) sought views on whether respondents agreed with the preferred housing and employment guidelines for Broseley. Of the unique respondents that completed this question:

- 19% agreed that the preferred housing and employment guidelines for Broseley;
- 32% did not agree that the preferred housing and employment guidelines for Broseley; and
- 49% don't know/ no opinion that the preferred housing and employment guidelines for Broseley.

## A.6. Question 16 (b)

Question 16 (b) sought views on whether respondents agreed with the development boundary for Broseley. Of the unique respondents that completed this question:

- 14.5% agreed with the development boundary for Broseley;
- 38% did not agree with the development boundary for Broseley; and
- 47.5% don't know/ no opinion with the development boundary for Broseley.

## A.7. Question 16 (c)

Question 16 (c) sought views on whether respondents agreed with the preferred housing allocation BRO012/BRO024 in Broseley. Of the unique respondents that completed this question:

- 9.8% agreed with the allocation BRO040/BRO041 for Broseley;
- 17.1% did not agree with the allocation BRO040/BRO041 for Broseley; and
- 73.1% don't know/ no opinion on allocation BRO040/BRO041 for Broseley.

## A.8. Question 16 (d)

Question 16 (d) sought views on whether respondents agreed with the preferred housing allocation BRO040/BRO041 in Broseley. Of the unique respondents that completed this question:

- 14.5% agreed with the allocation BRO012/BRO024 for Broseley;
- 31.5% did not agree with the allocation BRO012/BRO024 for Broseley; and
- 54% don't know/ no opinion on allocation BRO012/BRO024 for Broseley.

## A.9. Question 63

Question 63 sought views on whether respondents thought any additional 'Community Clusters' to those identified within the Preferred Sites Consultation should be formed or any of the existing 'Community Clusters' identified in the consultation document should be removed. Of the unique respondents that responded to this question, who were interested in the Broseley Place Plan Area, and completed this question::

- 19% agreed that a 'Community Cluster' needs to be formed;
- 6% agreed that a 'Community Cluster; needs to be removed;
- 44% do not agree 'Community Cluster' will be added or removed; and
- 31% don't know/ no opinion about addition or removal of 'Community Clusters'

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