

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

This requires a text addition to the existing map. PJR to do.

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

I think this is nitpicking, but it's not difficult to do – PJR to do

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

This is about structure and presentation. It's basically a cut and paste job. Tedious, but not difficult. PJR to do

Para 36 – bullet points

M4 – Amend the Plan to provide greater clarity in the use and presentation of maps reflecting the feedback provided in this report

Each map to be given title and number and included in the contents

Delete/remove conservation area map on page 43; include new text on page 5 map and widen the map to include all of the World Heritage Site

Ensure WHS site boundary is accurate in area of Calcutts Road

Move Policies map forward to Introduction; retitle and change legend

Change Avenue Road employment area as described in para 37

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

OM1 – [Be consistent in the use of supporting data throughout the Plan]

We could challenge this. Both figures are as quoted, but one is the census and the other is an estimate, and both are clearly identified as such. One possible amend might be as follows:

“Broseley is a small town in Shropshire, with a population at the time of the 2011 census of 4,929. We might also check with SC for a more recent figure

41. 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.]

It's a fair point to include an appendix with the documents we have used as our evidence base. Links on the other hand have a short shelf life. It's often easier to Google the title of the document.

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.

The revised Basic Conditions document needs to be included in the revised Plan

Para 52 – Eddie had dealt with this

Para 54 see my answer to para 50

Paras 67-69 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.

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:

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:

1. a) Beinkeepingwiththeformandmaterialsthatdefinethetown’sheritage
2. b) Beofadesignandusematerialthatrespectsllocalcharacterwithregardto:
 1. Floor area, roof pitch and roof height;
 2. Size of windows and facades; and
 3. Style and colour of brickwork and roof tiles as appropriate
3. c) Where possible retain existing walls and hedges and provide boundary walls on street frontages and hedges elsewhere
4. d) Incorporatetheuseoflocallydistinctivebrickand/orstoneheadersand decorative corbels, cornices and patterned/alternating brickwork on frontages
5. e) MinimiselightpollutionandhaveregardtoappropriateInstitutionofLighting Engineers’ guidance
6. f) Provide innovative high quality approaches to meeting the design principles on individual plots
7. g) Incorporate the use of street furniture using materials, colour and designs that respect local character, including existing street furniture that is retained. “

This is a drafting exercise . PJR to do

Paras 77-83

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

This is a drafting exercise . PJR to do

Paras 84-92 Policy HO2

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 (see para 89 for text)

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

Textual changes – PJR to do

Paras 93-96

M14 – Delete Policy HO3

This is disappointing, but not a surprise – PJR to do

Paras 97-103

M15 – Delete Policy HO4 and Appendix Four

I'm actually in agreement with this. PJR to do

Para 104 - 106

M16 – Delete Policy HO5

PJR to do

Para 107-8

M17 – Delete Policy HO6

PJR to do

Paras 109-114

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

This is a drafting exercise . PJR to do

Paras 115-120

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 e

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)

This is a drafting exercise . PJR to do

Paras 121-123

M21 – Delete Policy EJ2

PJR to do

Paras 124 – 133

refers to 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.”

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.”

24 – In Appendix 6: ○ Replace “2036” with “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,

Amendments to polices map to show correct boundary for Syspal development - MAPS

Textual changes as above - PJR

M25 – Amend the Policies Map to depict the Development Boundary as shown in Appendix 6

Paras 135 – 137

arises from above

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

Textual modification – PJR to do

check MAPS are consistent.

Paras 142 to 152

ref VGS and GR1 & 2

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

M28 for MAPS

Local Green Space individual areas for MAPS

remainder for textual changes

Paras 153 to 155

Policy GR3

M30 – Amend Policy GR3 to:

Delete “only”

Replace “adversely affect” with “have a significant adverse impact on”

textual changes – PJR

Paras 156 – 162

Green routes

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]

MAPS – new map showing RoW network

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]

Textual changes as above

MAPS – new Map showing green routes – possibly as an overlay on RoW map, as all are RoW

Para 164 and M33

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

Textual changes as above

Paras 165 – 167

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

Textual changes as above

Paras 168 - 170

M36 – Delete Policy CH1

Delete

Paras 171 – 172

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

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.

Textual changes as above

paras 174 – 177

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.”

Textual changes as above

paras 180-187

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)

M40 – Delete Policy VE2

Textual changes as above

Paras 188-190

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.”

Textual changes as above

paras 191-193

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

Textual changes as above

Paras 194 – 204

M43 – Replace Policy SD1 with: “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:

o Siting and orientation to optimise passive solar gain, and o The use of energy efficient measures such as loft and wall insulation and double glazing.”

CHALLENGE – the new wording does not include the clause:

d) The incorporation of on-site energy generation from renewable/sustainable sources such as solar panels.

No reason is given for this omission in the preceding text (p.195). In fact the paragraph says that the Policy as originally written is “consistent with national and strategic policy to improve energy efficiency and renewable energy provision”

This omission is particularly notable because the support for renewable energy has been retained in policy SD3. If this was an omission could section 'd' be reinstated in SD1?

If it were included our intention was that the provision of on site generation should only be applied to new development, as opposed to renovations and changes to existing structures. This is why we wrote a separate policy (SD2).

M45 – Amend Policy SD3 to:

Replace “heritage properties” with “heritage assets”

Replace “building” with “asset”

Delete from “and the development” to the end

textual changes

Paras 205-207

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

textual changes

Paras 208-213

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.]

poss text

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.

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.

