



BRIDGNORTH TOWN COUNCIL

BTC/AK/T6

✉ planningpolicy@shropshire.gov.uk

3rd February 2021

Dear Sirs

REGULATION 19: PRE-SUBMISSION DRAFT OF THE LOCAL PLAN (SHROPSHIRE)

Bridgnorth Town Council has concerns about the soundness (and legal compliance) of the Regulation 19: pre-submission draft of the Shropshire Local Plan, as currently presented, and the lack of evidence to support the scale of development, choice of sites, and sustainable delivery of proposals for the Bridgnorth area. We enclose submissions in the format requested.

In summary, we are of the opinion that the housing and employment land allocations are likely to be excessive and that there is insufficient evidence publicly available to justify the scale of these proposals. Furthermore, there is a lack of suitable evidence to justify the inclusion of a large site in Tasley (in the site allocations) to take almost all of the anticipated growth in and around Bridgnorth to 2038 and beyond. Consideration should be given again to reducing the scale of proposed development in the Bridgnorth area and its location as set out in the site allocations. We are mindful that there will be a requirement in future to review plans regularly and we feel that this means that a cautious approach to the scale of development and the impact of it on the area's infrastructure can reasonably be taken.

Reconsideration based on published evidence should be given to the 'all in Tasley' or 'all in Stanmore' question; some development on each site might be more suitable and deliverable, currently there appears to be no completed Infrastructure Plan or Highways Assessment and these are considered to be essential to make the plan in these areas sound. Furthermore, a reduction in overall numbers of houses required could reasonably lead to a number of smaller developments that would be more suitable.

Lee Jakeman PSLCC
Town Clerk
for Bridgnorth Town Council

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Website: www.bridgnorthtowncouncil.gov.uk
Town Clerk: Lee Jakeman PSLCC

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

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Part B: Representation

Name and Organisation:	Bridgnorth Town Council
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Bridgnorth Town Council considers that neither the established "Gunning Principles" for consultation, nor the process of community involvement as required by Shropshire Council's "Statement for Community Involvement for Shropshire (2011)" (SCI) have been followed adequately.

Our concerns over compliance with the "Gunning Principles" are:

- Proposals should be consulted on at a formative stage. Tasley Garden Village was introduced in April 2020 as a complete proposal. At this late stage, there was no time for any meaningful input to be made by BTC.
- There should be sufficient information for intelligent consideration. We do not consider that the information provided by the developers on the Tasley Garden Village was sufficient to allow us to make informed comment.
- There should be adequate time for consideration and response. Consultation by the promoters closed on 3rd June 2020, following a single video conference call that a

number of councillors tried to join without success. A subsequent Regulation 18 consultation, which featured Tasley Garden Village as Shropshire Council's revised preferred option for the Bridgnorth area, presented much less opportunity for public engagement than the previous Regulation 18 consultation which had the Stanmore Garden Village proposal as a preferred development option for the Bridgnorth area. We do not consider the time, or process used, for consultation was adequate.

- 'Conscientious consideration' must be given to the consultation responses before a decision is reached. No feedback on how submissions have been taken into account has been provided by Shropshire Council.

With regard to the SCI (see paragraph 2.5):

- SC has not 'engaged in a timely and constructive manner'. As discussed above, BTC do not consider that sufficient time was allowed for consideration of the proposed Tasley Garden Village, and the consultation was inadequate, allowing no opportunity for BTC to discuss the proposals with SC.
- With regard to constructive consultation, BTC has consistently expressed a view that it would only support development on the scale proposed provided that adequate planning was carried out for the required infrastructure and how it may be funded. We have received no feedback on this at any stage of the consultation and the published draft Local Plan and supporting evidence does not address it.
- We consider that SC's simply listing of submissions made to the Regulation 18 consultation does not meet the SCI's requirement to 'provide information on how people's views have been handled, including reporting back to communities ...'.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In our response, dated 23rd September 2020, to the Regulation 18 consultation on the draft Local Plan, Bridgnorth Town Council requested that Shropshire Council committed to a lower level of growth around Bridgnorth through to about 2032 and set outline targets for growth beyond that date. We requested that a new Site Allocation review be carried out. The full text of our request was set out in paragraph 1b of our letter of 23rd September 2020 and accompanying documents.

In our opinion, this process would allow the development of the Local Plan to be completed in a legally compliant manner, overcoming, in particular, the lack of consultation which has resulted from the late introduction of a proposal for a Tasley Garden Village.

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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To ensure clarity of our message.

(Please continue on a separate sheet if necessary)

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Signature:

Date:

2nd feb 21

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Part A Reference:

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(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	S3 & DP25	Site:	BRD030	Policies Map:	<input type="text"/>
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We have concerns over whether the plan is likely to be effective and fully deliverable over the plan period.

Both the Tasley Garden Village and the previously preferred Stanmore Garden Village proposals involve breaking out of existing development boundaries and opening up substantial new areas for development over a prolonged period. They involve significant growth in the settlement of Bridgnorth both over the plan period and longer term.

We feel that the proposals involve a significant re-shaping of the Town. Despite this, we do not feel that a whole town approach to shaping the future of Bridgnorth has been followed. In terms of planning for the facilities and infrastructure of the town the proposals largely seem to have been viewed in isolation and as an add-on.

Local infrastructure is already under strain – not just in the town itself but across the wider area (e.g. there is already insufficient electrical power capacity for employment sites, lack of high speed broadband, and poor mobile signals). We have particular concerns about traffic and transport (congestion, bottlenecks, connectivity and high levels of pollution).

We acknowledge that a strategic transport assessment is now being undertaken for Bridgnorth. We feel that this is likely to identify a need for significant infrastructure development not just locally to the proposed development sites but across a wider area, if growth in the town is to be pursued successfully. We would expect to see a comprehensive infrastructure plan, and a local transport plan which identifies how sustainable transport (walking, cycling and public transport) will be developed in the Bridgnorth area, which already has issues about traffic congestion, transport related air pollution, and a lack of accessible parking provision in the town centre. Neither of these critically important plans are currently available to support the Regulation 19 consultation.

In addition to our concerns about the ability of local infrastructure to cope with the proposed level of development, we have concerns about whether there is a clearly identified demand for new residents to come to Bridgnorth on the scale envisaged and for employers to base themselves in the town given its lack of connectivity. Bridgnorth's track record in developing housing is patchy at best, and past delivery of new employment areas has been small.

Currently, Bridgnorth's employment sites are concentrated on the eastern side of the town around Stourbridge Road and Stanmore Industrial Estate. We welcome that provision is made in the plan to facilitate further employment development in this area and capitalise on existing local skills in some sectors, albeit that this involves the release of Green Belt land and a need for compensating measures. However, we are concerned that a significant element of planned employment delivery relies on the development of additional employment areas at Tasley to the west of the town (further away from access towards the West Midlands conurbation and the main, though inadequate, north-south transport route to Telford and Kidderminster), where we have no previous experience of significant employment development. We feel that making Tasley the major focus of housing development may be less sustainable in terms of the impact on local infrastructure and more expensive in terms of the improvements needed.

These concerns represent a risk to the delivery of the planned level of housing and employment growth and the successful integration of new development into the town.

(Please continue on a separate sheet if necessary)

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Action to address these concerns

Prior to submission of a plan for examination, we would like to see:

1. A clearly documented analysis of infrastructure and urban capacity in Bridgnorth and proposals to address any issues, including identifying how improvements would be funded.
2. A slower pace of planned housing and employment growth so that future growth can be based on the experience of developing housing and employment in new areas. Growth plans can be adjusted in future iterations of the Local Plan once successful development and integration into the town have been demonstrated.
3. Taking in to account the preference of Bridgnorth Town Council for development of Stanmore over Tasley, reassess the suitability of the Stanmore and Tasley Garden Village sites for short to medium term development of housing in the light of infrastructure and transport assessments

(Please continue on a separate sheet if necessary)

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We do not consider the plan as currently drafted to be Justified as an appropriate strategy, taking into account the reasonable alternatives and proportionate evidence.

The regulation 19 draft of Shropshire's local plan 2016 – 2038 contains proposals for the development of 1,800 homes in the Bridgnorth area between 2016 and 2038, and the development of 49 Ha of employment land. These proposals include housing and employment development identified for the period 2006 – 2026 previously approved under the SAMDev plan. Development of a residential site for 500 homes and an employment site of 13.3Ha (including relocation of Bridgnorth Livestock Market) at Tasley allocated in the SAMDev plan has not advanced as far as the planning application stage as at January 2021. In reality, the current draft local plan would require delivery of 1700 homes (i.e. 1800 homes less those built -Appendix 5 page 345 refers- and those not yet built, but with planning approval granted) and in excess of 35 Ha of employment land in the period 2021 – 2038 in the Bridgnorth area.

The overall planned level of development for Shropshire over the plan period is 30,800 dwellings and 300 Ha of employment land. Development at Bridgnorth is a material element of Shropshire's overall draft plan – just under 6% of the homes and over 16% of the employment land. We understand that an element of the employment land provision in Bridgnorth is to provide choice and competition in the local market for business premises. Whilst doing so may be beneficial in terms of providing growth options for the future, it does suggest that some of the employment land may not be developed during the plan period.

Demographically, Shropshire's population and workforce is not self sustaining and the county is reliant on attracting new residents from elsewhere to maintain the population level. The Office for National Statistics projects (2014 based projections) that between 2016 and 2038 the number of households in Shropshire will grow by 19,136. Household size is expected to decline and we estimate that 7,965 of the household growth arises from the reduction in average household size and 11,171 to accommodate population growth. The population growth is in turn largely based on net migration to Shropshire (projected from past experience) from other areas of 44,000 people, partly offset by a 18,700 reduction due to deaths exceeding births. Shropshire's draft local plan aims for an increase by 30,800 dwellings so this is 11,664 (61%) more than needed to meet the ONS projections – we estimate that the extra dwellings would facilitate another 27,000 people moving to Shropshire over the plan period, 61% more than the ONS projections. The level of employment development appears to reflect an aspiration to provide one new job for every home built but we have a concern about the feasibility of this given that (even after allowing for the ONS projected 44,000 people moving into Shropshire), the "working age" (16-64) population of Shropshire is projected to decline by about 12,500.

There are no separate demographic projections available for the Bridgnorth area, but we do have a slightly higher age structure than Shropshire as a whole. We would thus expect that a similar picture of natural population decline, and reduction in household size and working age population, offset by people moving into the area would apply to Bridgnorth. We feel that the household and employment growth aspirations for the Bridgnorth area largely reflect a desire to attract new people into the area as part of Shropshire's overall growth strategy.

The plan for Bridgnorth represents a step change in the pace of development, and opening up a significantly sized area of countryside on the edge of the town (and separated from it by the A458 by-pass). We are not aware of any publicly accessible evidence of the market capacity for this level of housing development in the Bridgnorth area, nor of any assessment of the strengths and weaknesses of Bridgnorth (as re-shaped by the proposed level of development) in attracting new residents in competition with other areas. As noted earlier, the employment land proposals include an element of providing choice and competition in the local market for employment development, but do not provide a similar element of choice and competition for housing development.

We feel that the choice of sites for development has (save for the expansion of the existing Stanmore industrial estate) been heavily influenced by an aspiration to achieve a single large development. We would like to see evidence that development across a number of sites has been explored adequately.

Whilst regulation 18 consultation into the development options of Stanmore and Tasley has taken place, these have been separate exercises and the late emergence of the Tasley Garden village proposal has meant that the consultations on the two sites has taken place through different mechanisms. Consultation on the Tasley Garden Village proposal was limited to online consultation only during the Covid-19 pandemic, with no option for the public to examine the plans in person or discuss them at exhibitions and meetings. Despite this, a substantial volume of submissions was made and there is no publicly available evidence of how the views expressed have been taken into account. We feel that this consultation process is not in line with the Gunning

Office Use Only	Part A Reference:
	Part B Reference:

principles.

In addition to these concerns about whether the plan for the Bridgnorth area is Justified, we have concerns about whether it is Effective. The two issues and action to address them should be considered together.

(Please continue on a separate sheet if necessary)

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Action to address these concerns

Prior to submission of a plan for examination, we would like to see:

1. A moderation of the overall housing growth aspiration for Shropshire for 2016- 2038, to 26,000 homes (1,180 a year) mandated by the government as a minimum. If evidence of demand and deliverability for a higher level of growth emerges, this can be accommodated in future revisions of the plan.
2. A reduction in the level of housing development proposed for Bridgnorth by 500 homes, and a specific assessment of what is realistic in terms of housing and employment growth achievable in the Bridgnorth area over the period 2021 – 2038.
3. A clear commitment to identifying the local housing need for Bridgnorth, keeping it under review, and identifying how that need (particularly smaller and affordable homes) can be met through market and non-market development.
4. Evidence of the availability (or otherwise) of sites other than the Tasley Garden Village site and evidence about why they should not be allowed to proceed.

(Please continue on a separate sheet if necessary)

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