

## 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)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Worfield & Rudge Parish 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.

Worfield & Rudge Parish Council objects to the draft submission the Local Plan as it fails to comply with the tests of soundness of the NPPF/Gunning Principles and remains to meet the needs of the Local Community.

We wish to highlight the following concerns:

## 1 Existing SAMDev / Proposed housing development

For the Local Plan to have been justified as an appropriate strategy based upon credible evidence i.e.

- A Local Housing Needs Assessment for the Bridgnorth place plan area. Without this, consultees cannot come to an informed decision on the proposed amount of housing for Bridgnorth and the surrounding Parishes, which includes Worfield & Rudge Parish in significance. A decision regarding the appropriateness of the plan cannot therefore be formed.
- There is no justification for the level of growth in employment assumed in the draft Local Plan.
- It lacks justification for an arbitrary allocation of 1800 proposed dwellings in the Bridgnorth place plan area, given part of this allocation, 500 dwellings, forms the remaining allocation of SAMDev.
- The plan fails to provide credible evidence demonstrating how the significant shortfalls in the delivery of jobs, housing and businesses will be addressed from the previous plan periods.
- A strategic highways assessment for the Bridgnorth area, including an explanation of how Bridgnorth can be part of the Strategic Transport Corridor which is a central strategic plank of the draft Local Plan. The latest draft of the Local Plan states that a highways assessment will be carried out. However, we consider that the draft Local Plan cannot be sound without the inclusion of such an assessment in the evidence base.
- An Infrastructure Plan, which we would expect to cover the necessary infrastructure to support the proposed/any level of growth.
- No credible evidence has been made available demonstrating the sustainability of the proposed plan based upon past delivery of jobs from the current SAMDev allocation.

## 2. Infrastructure in respect of Highways

The availability of sufficient infrastructure underpins good plan making, and quite rightly is one of the issues which attracts comments at consultation. The Local Transport Plan was not available for consideration of the Plan at Regulation 18 or Regulation 19, or at the time of the Shropshire Cabinets decision and casts doubt on being able to make an informed decision about the soundness of the plan.

The strategic approach also responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors, utilising existing road and rail connections. Bridgnorth is not on a strategic corridor. Investing in Strategic Transport Corridors in The Marches, The Marches Local Enterprise Partnership May 2016, which is an underpinning document for The Marches Economic Growth Strategy for Shropshire 2017–2021 advised that Bridgnorth is not positioned on a strategic transport corridor.

Many of the assumptions and growth forecasts for Bridgnorth and adjoining Parishes including Worfield & Rudge, both housing and industrial growth are based on the claim/assumption that the town is positioned on a strategic transport corridor. This casts doubt on Shropshire Cabinets being able to make an informed decision, with the information being incorrect or unavailable.

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Part A Reference:

Part B Reference:

### 3. Provision of adequate workplace and commercial opportunities.

The level of employment development proposed for 2016 – 2038 for the Bridgnorth area is not clear. 49Ha of employment land is proposed to be made available “to create choice and competition in the market” (S3.1 para 1).

This appears to comprise 13.3Ha (net developable) allocated under SAMDev (albeit that part of this is for the relocation of the existing livestock market, enabling its site to be developed for other purposes), 11.4Ha of Green Belt land adjacent to Stanmore Industrial Estate, and 16Ha employment land at the proposed Tasley Garden Village. These do not total 49Ha (schedule A6 gives a figure of 37.7Ha as the employment “strategic land supply 2016 – 2038” for Bridgnorth and surrounding Parishes). This comprises 9.1% of the county’s total, however; by contrast the residential development guideline for Bridgnorth is 5.8% of the county total.

Table 18 of the Shropshire AMR 2017-18 indicates completed employment development for Bridgnorth of 6.5Ha for the 11 years 2006 – 2017 (average 0.6 Ha p.a.). It is claimed in the AMR that “It is anticipated that Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development”.

We have seen no evidence to suggest that Bridgnorth is an attractive location for new employment development and would be concerned about whether this is realistic given the town’s relatively weak transport connectivity.

We note that the Shropshire Viability Study (HDH Planning and Development, July 2020) indicates the Office and Industrial development are generally considered NOT VIABLE in Shropshire on either Green Field or Brown Field sites (albeit that the viability calculation for “larger industrial” development on green field sites is marginal – Viability Study Appendix 18). Para 12.84 of the study states:

“To a large extent the results are reflective of the current market. Office development and industrial are both shown as being unviable, however this is not just an issue here, a finding supported by the fact that such development is only being brought forward to a limited extent on a speculative basis by the development industry. Where development is coming forward (and it is coming forward), it tends to be from existing businesses for operational reasons, rather than purely for property investment reasons.”

Whilst hotel, prime retail, supermarket and retail warehouse type developments appear to be viable in Shropshire on either green or brown field sites in Shropshire, it is our understanding that the proposed new employment land allocations are not intended to be substantially developed for these purposes. We note that it is stated that the saved SAMDev allocations include a suggestion of a hotel at BRID001 & 020b, and offices, industrial and warehouse uses at ELR011a.

Unlike the proposed new housing allocations, separate viability calculations have not been published for the proposed allocations for employment development at Stanmore and Tasley Garden Village.

The employment elements of the Tasley and Stanmore Garden Village schemes are part of mixed-use allocations, whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure.

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	Part B Reference:

In summary, Worfield & Rudge Parish Council does not feel that there is evidence to support the proposition that the planned level of development in the Bridgnorth and surrounding Parishes is deliverable over the plan contained within the proposition currently being recommended to Shropshire Council.

The Interim Planning Policy and Strategy Manager for Shropshire Council has stated that “the bar is high” for seeking change to the Greenbelt. This statement was made regarding the preference of the Tasley site over the Stanmore site in respect of development. Yet the proposed expansion of Stanmore Industrial estate would require change to this Greenbelt policy.

This is an inconsistency of approach which requires justification.

*(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.*

Key evidence is missing from this draft submission, which would make this plan legally sound. The strategy selected must be backed up with proportionate evidence justifying the strategy, all alternatives must be considered and Shropshire Council must demonstrate that the selected strategy is truly community lead.

Shropshire Council must provide all credible evidence that is missing before Cabinet and Council are asked to submit the Local Plan to the inspectorate. The strategy selected must be backed up with proportionate credible evidence justifying the strategy, all alternatives must be considered and Shropshire Council must demonstrate that the selected strategy is truly community lead.

We recommend that the plan is modified, in line with the proposals in the 1<sup>st</sup> edition of the Bridgnorth Plan. In brief we recommend that the scale of development around Bridgnorth be reduced over the plan period 2019 to 2036 to no more than 1000 dwellings in total, no single site is selected, and the Regulation 18 is repeated ensuring community involvement.

*(Please continue on a separate sheet if necessary)*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**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)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

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

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	Part B Reference:

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

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

We hope that our concerns over the failure to be Legally Compliant can be overcome, preferably in the way proposed above. We are committed to working constructively with Shropshire Council to achieve this.

If it cannot be achieved, then we would wish to participate in any hearing sessions and provide any additional information and supporting material requested by the Examiner.

*(Please continue on a separate sheet if necessary)*

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: Mr C Furnival

Date: 19/02/2021

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Part A Reference:

Part B Reference: