13th December 2020

Robert Macey
Portfolio Holder for Housing and Strategic Planning
Shropshire Council, Shirehall, Abbey Foregate,
Shrewsbury SY2 6ND

Approval of the Regulation 19 Pre-submission draft of the Local Plan

Dear Robert,

I am Chairman of the Bridgnorth Plan Steering Group and am writing to share my personal views on progress towards the Shropshire Local Plan. The views expressed in this letter are my own and not necessary those of the Steering Group. For clarity, I am also a Bridgnorth Town Councillor and the views do not represent Bridgnorth Town Council (BTC) in any way.

I wish to raise three related issues:

- The Bridgnorth Plan Steering Group was formed with the support of Bridgnorth Town Council, Tasley Parish Council and Quatt Malvern Parish Council, as well as Bridgnorth Chamber of Commerce and other local organisations, businesses and residents. We also seek to involve other local parish councils, keeping them informed of progress and taking notice of any inputs they and their residents make.

  Staff in Shropshire Council strongly encourage the formation of such groups to work towards Town and Neighbourhood Plans. In response to such encouragement, I attended a training session on this with other councillors in September 2017. Subsequently, BTC carried out consultation on stages of the Local Plan and also set up the Bridgnorth Plan Steering Group with the aim of revising the Town Plan produced in 2012.

  The Steering Group has involved a cross section of the community, carried out detailed consultation and produced a number of reports, all of which have been copied to council officers: see our website, linked to below. We have also constructively supported Shropshire Council's officers in their work on the Local Economic Growth strategy. We have held a very few meetings with council staff, most if not all at our instigation. We have received no encouragement and no support, although such support has been alluded to at times. Overall, my impression is that your staff would far prefer not to have received any response to their consultation exercises.

  Our reports have contained constructive and workable ways in which the Local Plan could have progressed, with sufficient dwellings approved around Bridgnorth to meet Shropshire Council's obligations for a 10-year land bank, whilst carrying out a new Site Assessment to seek a better approach than either of the proposed garden villages on the edge of our historic market town. That would also give time for competent plans to be put in place for implementing and financing the necessary infrastructure. We have not received a response from Shropshire Council to all of this work.

  All involved have been carrying out this voluntary work in light of Shropshire Council's 'Statement of Community Involvement for Shropshire', which contains guiding principles for effective community involvement. I am sure that you are fully aware of these.

  I can find little evidence of any changes to the Local Plan to reflect our inputs, except possibly that the need for a strategic highways assessment has been recognised. Overall,

I am certain that Shropshire Council has not effectively involved the Bridgnorth community in its work towards the revised Local Plan.

- The Steering Group asked a question for item 7 of last Monday's Cabinet meeting, which I have appended to this letter, together with your response.

  We were told that we could ask one question and did so, although I note that multiple questions were allowed from others. We therefore set the scene for our question in a preamble, and our question asked about the supporting documents mentioned in the preamble: Appendix 4, the Infrastructure Plan and the highways assessment.

  However, only the question itself was read out at the Cabinet meeting and your answer only refers to Appendix 4. It is incomplete and totally evades the lack of an Infrastructure Plan and highways assessment.

  Could you please explain how, without these documents, the recommendation for the scale and location of development proposed around Bridgnorth can be have made professionally, with the level of detailed planning required to demonstrate that it is achievable, both practically and financially? Can you demonstrate that this is an optimal way of spending taxpayers' funds to provide the amount of housing proposed, compared to development closer to dual carriageways and railway stations on the "strategic transport corridors" that are central to the draft Local Plan?

- I am concerned that we are facing a loss of trust in the democratic process in general. When asked to comment on the Local Plan, as an example, too many people say something along the lines of "Why should I, Shropshire Council doesn't take any notice." How am I supposed to motivate people to participate and help to improve things? We have access to a vast range of experience from the voluntary sector, business, IT and change management that is currently being ignored.

I'd like to stress that we are not against development around Bridgnorth and have proposed a justifiable level of growth and a way in which a range of alternative locations can be considered. That would include more time to review the proposed Tasley Garden Village in more detail and demonstrate that adequate infrastructure could be provided and financed.

The Steering Group remains committed to working positively to help ensure the best future for Bridgnorth and Shropshire. Members are currently working with Shropshire Council, Bridgnorth and Tasley Parish Councils, Sustainable Bridgnorth, the Chamber of Commerce and others to try to progress projects on short-term, low-cost highways improvements, EV charging, cycleways / footpaths and "Future Bridgnorth".

However, we will also submit our views on the draft Local Plan to the examiner, pointing out where we consider that it, and the process by which it has been developed, are not sound. I hope that we will have the support of our local Shropshire Councillors, some of whom have expressed their disquiet, and those standing in next May's elections in constructively objecting to the immaturity of your current proposals.

Yours sincerely,

Clive Dyson PhD, MBA, MA

www.bridgnorthtownplan.weebly.com

Question to Cabinet on item 7

The question submitted was:

> *"The Regulation 19 draft local plan includes an assertion that all comments made at the Regulation 18 stage have been considered in drafting it. This is reflected in the Cabinet report at 5.5, which states that "officers have reviewed and considered comments made" and that "A detailed summary of all the consultation responses is included as Appendix 4 to this report."*
>
> *Appendix 4 should evidence how the comments made have been reflected in the draft plan, but it has not so far been published and the Cabinet report gives the impression that it will be part of the evidence base for the proposed Regulation 19 consultation.*
>
> *In its submission to the Regulation 18 consultation, Bridgnorth Plan Steering Group raised questions about the scale of proposed residential and employment development around Bridgnorth, its location, and the infrastructure needed to support it. It is not clear how these issues have been addressed in preparing the Pre-submission Draft of the Local Plan. It appears that few relevant changes have been made.*
>
> *Paragraph 2.28 of the draft plan refers to an Infrastructure Plan, which might address some of our concerns. However, we are not aware that any such document has been published.*
>
> *The Settlement Policy for the Bridgnorth Place Plan area states (para 5.62) that "a strategic assessment of the highway network will be undertaken." We do not understand how a final recommendation on the scale of development around Bridgnorth can be made when such a critical assessment is still outstanding.*
>
> *Given the absence of these supporting documents to inform their decision, how can members of the Cabinet be confident that the draft Local Plan is sound and that the scale and location of development proposed around Bridgnorth is sustainable?"*

You answered the question as follows:

> *"Appendix 4 to the Cabinet report provides a comprehensive and detailed summary of the comments made as part of the Regulation 18 draft local plan consultation. This is intended to provide Cabinet and other interested parties an opportunity to identity the issues raised. Whilst there is no requirement for the council to provide detail of how these comments have been addressed, the Cabinet paper does specifically point to a number of significant changes made to the Plan in paragraphs 5.9-5.15 and the rationale for these. If approved, stakeholders will have the opportunity to comment on the soundness of the Plan as part of the consultation at Regulation 19."*