Shropshire Council: Shropshire Local Plan

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:	Bridgnorth Plan Steering Group

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:	All	Policy:	All	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.

We submit that the draft Local Plan is not legally compliant as neither the process of community involvement as required by Shropshire Council's "Statement for Community Involvement for Shropshire (2011)" (SCI) nor the "Gunning Principles" have been adequately followed.

Bridgnorth Plan Steering Group was established with encouragement from Shropshire Council (SC), and with the support of Bridgnorth Town Council, Tasley Parish Council, Bridgnorth Chamber of Commerce and other local organisations and businesses. It meets the indications of types of consultees in the SCI and responded constructively to the Regulation 18 Consultation. With regard to the 'Guiding Principles' in the SCI (paragraph 2.5):

- SC has not 'engaged in a timely and constructive manner'. There have been a series of consultation exercises, but comments from the local community, including those from Parish Councils and the BPSG, have been ignored and have not been responded to. The concept of a Tasley Garden Village was only revealed in April 2020, and the promoters

carried out just one month's consulation, closing on 3rd June 2020. This occurred during the COVID-19 pandemic and only consisted of a video conference meeting called at short notice, in which most residents found they were unable to participate. Shropshire Council then opened the Regulation 18 consultation to submissions on 3rd August. This is too short a period for consideration of such a significant change.

- With regard to constructive consultation, submissions from the local community have consistently expressed concern that a full infrastructure plan, showing deliverability and funding, is needed for a proposal on this scale. We cover the lack of such a plan in a separate form. Here we note that the submissions made have not even been acknowledged, demonstrating a total lack of constructive consultation. Other examples can be provided to the Examiner for most stages of the consultation.
- SC only held one community consultation meeting around Bridgnorth during the first regulation 18 consultation, no meetings were held at the second regulation 18 stage and none at regulation 19. The outputs of these seem not to have been considered, and nor have results from the communication meetings and surveys carried out by BPSG. SC has used over-structured methods to receive submissions, for what appears to be administrative convenience. As a result, lines of consistent argument that have been advanced have been broken into isolated comments on individual paragraphs of draft documents. We consider that the methods used to inform and engage communities in the planning process have been totally inadequate.
- SC have proposed large-scale development around Bridgnorth at short notice. We do not consider that recent consultation has been proportionate to such a significant change in the proposal (from Stanmore to Tasley Garden Village), and we believe that a majority of residents have not been aware of each stage of consultation.
- SC has only provided tabulations of submissions to the Regulation 18 consultations. However, the SCI requires SC to 'provide information on how people's views have been handled, including reporting back to communities …' It is evident that providing a summary of submissions does not begin to meet this commitment. As one example, how have the comments that there is inadequate planning for infrastructure and highways been handled?

With reference to the "Gunning Principles":

- Proposals should be made at a formative stage. The modification to recommend a Tasley Garden Village rather than the long-announced Stanmore Garden Village was made in a very advanced form, clearly after significant discussion between the developers and SC planning department. It was presented as a 'fait accompli' with no alternatives offered for consultation or other constructive proposals being made in response being considered. This consultation was not made at a formative stage.
- There should be sufficient information for intelligent consideration. Information on the Tasley Garden Village itself was limited to outline plans and what we consider to be 'publicity material'. Much of the content was incorrect, such as providing adequate pedestrian links and cycleways to the town centre and the level of highways improvement required.
- There should be adequate time for consideration and response. This has not been adequate as disussed above.
- 'Conscientious consideration' must be given to the consulation reponses before a decision is reached. No evidence has been provided to show that consultation responses have been taken into account. We would expect a written summary of key lines of objection and an explanation of how each as been handled, especially for such significant, and late, changes to the draft Local Plan

In addition to the above, we consider that important questions raised at the Shropshire Council Cabinet meeting held on Monday 7th December 2020 (item 7) were evaded, and that members were not provided with necessary reports, so that the decision to approve the draft regulation 19 Local Plan was ill-informed. For more information see a letter from the Chairman of BPSG to Councillor Robert Macey (https://bridgnorthtownplan.weebly.com/uploads/9/0/5/9/90599027/robert_macey_20_12_13.pdf), which he has not acknowledged or replied to. We consider that this is typical of the level of cognisance given by SC to feedback from the local community.

(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.

We propose that the plan is modified, in line with the proposals in the 1st Edition of the Bridgnorth Plan, which is consistent with submissions from Bridgnorth Town Council and Tasley Parish council.

In brief, this recommends that the scale of development around Bridgnorth be set to meet need until about 2032, providing for sufficient dwellings to meet the need for a 10-year land bank, and that a new Site Assessment be carried out for longer-term needs, giving the opportunity to demonstrate that SC's SCI has been revisited and its requirements met.

(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)

☑ 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.*

Office Use Only	Part A Reference:
	Part B Reference:

Signature: [ ]

Date: 25/02/2021

Office Use Only	Part A Reference:
	Part B Reference: