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:		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.

We consider that the plan has not been justified as an appropriate strategy. It has not been demonstrated that all reasonable alternatives have been considered, and sufficient, proportionate credible evidence has not been provided. Many strategic documents are missing or lacking credible evidence. We therefore consider the plan to be "not sound".

In its submission to the Regulation 18 consultation and other submitted documents, Bridgnorth Plan Steering Group (BPSG) provided a reasonable alternative for the Bridgnorth area. We have received no communication or other feedback to indicate that this has been considered.

For the Local Plan to have been justified as an appropriate strategy based upon credible evidence we previously asked that the following should be included in the evidence base, and they have not been made available:

- 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 the area. A decision regarding the appropriateness of the plan cannot therefore be formed.

- A justification for the level of growth in employment assumed in the draft Local Plan.
- A justification for the allocation of 1800 proposed dwellings in the Bridgnorth Place Plan area, which appears arbitrary. About 500 of the dwellings are saved SAMDev allocations.
- 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 period.
- A local Economic assessment of the Bridgnorth place plan area is missing.
- A justification for the Unitary Authority allocating 30,800 homes, when the housing need assessment carried out by Shropshire Council (Local Housing Need 2020) indicates that 25,894 are required.
- The evidence base is missing relevant information regarding provision of single occupancy dwellings as compared to Office for National Statistics sub-National Housing Projections (2014 based), which predicts a significant proportion of growth will be associated to single households.
- A strategic highways assessment for the Bridgnorth area, including an explanation of how Bridnorth 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 level of growth.
- No credible evidence has been made available demonstrating that sustainable growth, addressing Bridgnorth's low level of employment self-containment, would result from the planned housing and employment land allocations. 757 dwellings were delivered between 2006 and 2019 and whilst there has been some delivery of employment land (on a much lower scale than is now proposed) it is unclear whether local employment has kept pace with household growth. 643 homes provided for under SAMDev remain to be delivered up to 2026 and there remains a significant shortfall in employment delivery.

Reasonable alternative plans have been shared with Shropshire Council however:

- Shropshire Council have not engaged with the community when asked to during the Regulation 19 and previous Regulation 18 consultation, no community meetings have been held.
- There is no evidence that Shropshire council have constructively considered the viable alternative that BPSG shared at the Regulation 18 consultation.
- There is no evidence that community responses to both Regulation 18 consultations have been fully considered.

Lack of realistic credible employment land allocation

- Evidence demonstrates from SAMDev for Bridgnorth place plan area that little employment land has been delivered over the previous plan period. The Regulation 19 strategy provides no credible evidence as to how the proposed new supply will be delivered or can be delivered set agains existing allocations. This is missing from the Viability assessment.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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.

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 led.
We recommend 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 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 (including the approximately 500 dwellings already included in SAMDev), 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)

☑ 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 that the draft Local Plan is not Sound 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: Date: 25/02/2021

Office Use Only	Part A Reference:
	Part B Reference: