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 plan has not been **positively prepared**, and is therefore not sound, because:

- The housing need for the Bridgnorth Place Plan area has not been objectively assessed. A Local Housing Needs Assessment has not been carried out for the Bridgnorth Place Plan area. Without this, we consider that the best available assessment for housing need around Bridgnorth remains that produced by Bridgnorth District Council in 2006. We extrapolated this to 2036 in the BPSG 'Consultation Document', which was sent to Shropshire Council, reaching the conclusion that 15,168 dwellings would be needed by 2036, compared to the 16,200 dwellings proposed by the version of the Local Plan at the time. We have received no feedback on this (or any other of our inputs) from Shropshire Council. We have not repeated the analysis since the Local Plan was extended to 2038, but the housing need for the Bridgnorth area has not been recently accessed, and therefore cannot have been objectively assessed.

- A 'Statement of Common Ground' has not yet been agreed with other Local Authorities, under the Duty to Cooperate. This would include agreement on the housing needs of adjacent and other local authorities and the extent to which they anticipate not being able to meet them. We understand that not all the other local authorities have completed their own housing needs assessments. Paragraph 2.27 of the draft Local Plan confirms that discussions have been held but that Statements of Common Ground will only be available when the plan is submitted for Examination. They have not been available for consideration as part of the Regulation 19 consultation. Shropshire Council has decided to allocate an additional 1,500 dwellings to meet the needs of other Local Authorities, including the Association of Black Country Authorities (ABCA). We note that none of the members of the ABCA are directly neighbouring authorities to Shropshire. It may be more appropriate for Telford and Wrekin to contribute to this need. Furthermore, we can find no evidence that any financial contribution has been agreed with these authorities to cover the additional infrastructure costs that will be needed to provide for the additional 1,500 dwellings. Again, without this information we consider that the Local Plan has not been positively prepared or objectively assessed.

(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.

Shropshire Council should reduce the housing requirement for Shropshire by removing the allocation for ABCA under the Duty to Cooperate. The Local Housing needs assessment for Bridgnorth Place Plan area must be carried out. Under the Duty to Co-operate a Statement of Common Ground is required and we consider that Telford and Wrekin authority must be approached to assess if the need for housing and employment can be met more sustainably by Telford and Wrekin Authority. Information already provided by BPSG, and others, should be taken into account, and shown to have been taken into account, during the plan-making process.

(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)

Office Use Only	Part A Reference:
	Part B Reference:

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: