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:	S3	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 is not Effective. We do not feel that there is evidence that the plan is deliverable over the plan period.

The plan includes proposals for a level of development of homes and employment land in the Bridgnorth area which appear to be well in excess of previous delivery levels, and we are unable to identify evidence that there is the market capacity in Bridgnorth to absorb the proposed level of development. Further, at the time of the Regulation 19 Consultation there is no infrastructure plan available and a Strategic Transport Assessment for the Bridgnorth area has not yet been carried out and reported. The lack of an infrastructure plan or strategic transport assessment means that it cannot be evidenced that the local infrastructure is adequate to support sustainable delivery of the proposed level of development, nor that necessary improvements can be provided through infrastructure contributions from development.

Housing development

The level of new homes proposed for the period 2016 to 2038 for the Bridgnorth area is 1,800 homes. However, Schedule A5(i) to the draft plan indicates that the number of housing completions in the area for 2016 – 2019 was 52, so 1,748 homes would have to be delivered in 19 years. This is an average delivery rate of 92 per year. In reality, there appears to have been little development in 2019 to 2021 to date, and the allocations made for the period 2016 – 2026 under SAMDev have not so far progressed to the planning application stage, so the actual rate at which homes would have to be built and occupied would need to be higher than 92 per year if the planned level of housing growth is to be delivered.

Shropshire Council's Authority Monitoring Report for 2017 - 18 indicates (Table 7) that there were 728 net dwellings completed in Bridgnorth in the 10 years to 2016 i.e. 72.8 per year. Achieving the draft Local Plan's aspiration for Bridgnorth for 2020 - 2038 would require an uplift of at least 26% on the rate of past delivery. We have not seen evidence to support the proposition that the local housing market can sustainably support a markedly higher level of delivery than has been achieved in the past, in competition with other centres.

Whilst the Shropshire viability study (HDH Planning and Development, July 2020) does test the financial viability of potential development of both the Tasley and Stanmore Garden Village proposals as 2 of 7 "strategic" housing sites, and suggests that they may be financially viable, this is subject to the caveat (para 10.83) that "In considering these it is important to note that the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites" and gives a "best estimate" of the amount of infrastructure contribution required. It appears to us that the evidential value of this assessment in supporting a contention that these sites are deliverable within the plan period is low in the absence of an infrastructure plan and (in particular) a strategic transport assessment for the Bridgnorth area.

Employment development

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. It will be noted that these do not total 49Ha and Schedule A6 gives a figure of 37.7Ha as the employment "strategic land supply 2016 – 2038" for Bridgnorth. This nevertheless comprises 9.1% of the county's total. 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 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 calaculation 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 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. In reality, 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.

In summary, we consider that there is insufficient evidence to support the proposition that the planned level of development in the Bridgnorth area is deliverable over the plan period.

(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.

Overall, evidence of deliverability of development on the scale proposed for Bridgnorth is required, or a reduction in the scale of development to nearer historically established levels alongside a review of the infrastructure (including transport) required to support any revised proposals. The actual level of overall new employment development proposed for the Bridgnorth area should be clarified.

Appropriate evidence of deliverability which would need to be provided would include:

1 Evidence of the market capacity to absorb significantly higher levels of both housing and employment development than has been achieved in the past in the Bridgnorth area.

2 The ability of local infrastructure across the Bridgnorth area (such as transport and movement) to support development on this scale and to integrate it successfully into the Town and wider transport network should be critically examined and an appropriate infrastructure investment plan produced with sources of funding clearly identified.

3 A detailed statement of what infrastructure contribution the Garden Village proposals would be required to make should be produced.

4 Viability calculations for the Garden Village developments should be re-visited so that they clearly include both the housing and employment elements and should be accompanied by a statement of what planning obligations would be expected to ensure delivery of the employment elements alongside policy compliant housing provision.

(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: