



For Shropshire
Council use

Respondent
no:

Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

Pre-Submission Draft (Final Plan)
17 March 2014 – 28 April 2014

Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:

www.shropshire.gov.uk/samdev

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

Name:	OLIVIA GLAZE - DEPUTY TOWN CLERK
Organisation (if applicable):	BRIDGNORTH TOWN COUNCIL
Address:	
Email:	Olivia.glaze@bridgnorthTownCouncil.gov.uk
Telephone:	

If you are acting as an Agent, please use the following box to tell us who you are acting for:

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

PLEASE SEE ATTACHED PAPERS

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

No, I wish to pursue my representations through this written representation.

✓

If you wish to attend the examination, please explain why you think this is necessary in the box below:

N/A

Do you wish to be notified of any of the following? *Please tick all that apply. We will contact you using the details you have given above.*

When the SAMDev Plan has been submitted for examination	✓
When the Inspector's Report is published	✓
When the SAMDev Plan is adopted	✓

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

PLEASE SEE ATTACHED PAPERS

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

PLEASE SEE ATTACHED PAPERS

Please return this form by 5pm on Monday 28 April 2014

You can e-mail it to:

PlanningPolicy@shropshire.gov.uk

Or return it to: Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Please note, we will acknowledge receipt of representations made by e-mail.

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.

Bridgnorth Town Council

Statement of reasons for objecting to the Shropshire Site Allocations and Management of Development (SAMDev) DPD Pre-Submission Draft (Final plan)

1. Bridgnorth Town Council is making this representation on the Soundness of Shropshire Council's draft SAMDev DPD. The Town Council's main concerns are with settlement policy S3 and the inclusion on the proposals map of the following sites:

Land north of Wenlock Road, Tasley (BRID001/BRID020b)

Land north of Church Lane, Tasley (BRID020a)

Land at Tasley south of the A458 bypass (ELR011/a)

Land at Tasley south of A458 at Tasley (ELR011/b)

Bridgnorth Town Council considers that, in including the above sites in the proposals map, the SAMDev DPD has been neither **positively prepared** nor **justified**.

2. Core Strategy requirements

- 2.1. It is the Town Council's understanding that the SAMDev DPD is intended to support the implementation of Shropshire's adopted Core Strategy. The Town Council is concerned that, in respect of the Bridgnorth area, it exceeds the anticipated level of development set out in the Core Strategy, for reasons which are neither adequately explained nor justified.
- 2.2. Core Strategy policy CS1 sets out the anticipated level of development in the County between 2006 and 2026 as 27,500 new homes and 290 Hectares of employment land with accompanying infrastructure. It also states that the SAMDev DPD "*will make provision for housing and employment needs in the towns, Key Centres and rural areas having regard to the differing pressures, opportunities and constraints in the spatial zones*" and sets out the range of anticipated development for each spatial zone.
- 2.3. The indicated levels of development for the East Shropshire spatial zone, which includes Bridgnorth, is 3,025 – 3,575 dwellings and 30 - 40 hectares employment land, together with additional housing provision of up to 1,000 dwellings, if required, for returning military personnel.
- 2.4. The range of anticipated levels of development in East Shropshire is broader than in the other spatial zones. Excluding the possibility of additional housing for returning military personnel, the width of the range of potential housing development is 16.6% around the mid point and for employment land it is 28.3%. By contrast, the range for Central Shropshire is the narrowest of all the spatial zones at 6.4% for housing and 10% for employment land. It is not clear why this approach was chosen.

- 2.5. Core Strategy policy CS3 sets out the intended roles of the various Market Towns and Other Key Centres. The policy itself is descriptive rather than quantified, with the statement that *“Bridgnorth will provide a focus for development within the constraints of its location on the edge of the Green Belt and on the River Severn”*.
- 2.6. The Core Strategy document contains explanatory notes to policy CS3. Para 4.33 states that the detailed level of development in each Market Town and Key Centre will be determined by the SAMDev DPD, and that *“Levels of housing, other development and community facilities, services and infrastructure provision will be determined through discussion and agreement particularly with Town and Parish Councils to provide an appropriate and sustainable pattern of development.”*
- 2.7. The notes to policy CS3 include an indication of potential levels of housing development in Table 2. The indication for Bridgnorth for the 20 year period 2006 – 2026 is 500 – 1000 homes.
- 2.8. The Core Strategy document does not provide an indication of the level of employment land provision anticipated at the “Market Towns and Key Centres” level, this information is only given for the relevant Spatial Zones.

3. Bridgnorth development history

- 3.1. The notes to policy CS3 also include as Table 3 information about past residential and employment development levels, residential completions and commitments for 2006-2009, and an indication of existing housing allocations plus potential sites available within the existing settlement boundary (per the Strategic Housing Land Availability Assessment 2009). Bridgnorth is shown as having an average rate of housing development for 1998 – 2008 of 28.4 homes per year, but with 639 homes built in 2006 – 2009 or committed as at April 2009, and no site availability.
- 3.2. The apparent large increase in the level of residential development in Bridgnorth indicated by Table 3 would appear to be a consequence of site allocations in the Bridgnorth District Local Plan 2006 – 2011 becoming fully committed by April 2009, notwithstanding that the Bridgnorth District Local Plan sought to allocate a 10 year supply of housing land.
- 3.3. The Bridgnorth District Local Plan 2006 – 2011 also allocated 9.5 Hectares of employment land in Bridgnorth, at Stanmore Industrial Estate, Faraday Drive, and Chartwell Park.

4. Consultation processes

- 4.1. Shropshire Council initially consulted on SAMDev issues and options in 2010. This consultation sought views on the prospective level of housing and employment development for the period 2006 – 2026, and the direction of future development. For the Bridgnorth area, the housing options offered were 500, 700, 800 or 1,000 homes and employment land provision was merely given a descriptive range from “minimal” to “maximum”. Bridgnorth Town Council expressed a preference that housing development be focussed on the needs of young people, avoid large expensive homes, and *“That employment opportunities should match the number of dwellings being built to reverse the trend of Bridgnorth being considered a commuter town”*.
- 4.2. Although not initially a part of the Local Development Framework process, a Town Plan was developed for Bridgnorth between 2009 and 2011, and adopted by Bridgnorth Town Council on 20/12/2011. This community – led exercise looked at a wide range of topics, including Housing. The Town Plan publication includes the following comment: *“From the answers to our Question 9 of the Questionnaire, it is apparent that the majority of respondents believe that Bridgnorth has grown too much in recent years and lost its traditional ‘market town’ character. (they are also concerned that there is already consent granted for a further 500 houses in the town). All future new housing should be small scale infill schemes. It is unfortunately true with Telford being so close, and having all the modern facilities and employment opportunities, this is where all future major development should take place, and Bridgnorth should concentrate its energies on developing, maintaining and improving its existing ‘character’ and ‘tourism’.”*
- 4.3. Shropshire Council consulted on its SAMDev preferred options in Spring 2012. The consultation document for Bridgnorth included a statement that Bridgnorth Town Council supported the development of 1,200 homes over the plan period. This would mean 600 homes would need to be built over and above existing commitments, and it was proposed to achieve this by allocating land at Tasley (a separate Parish adjacent to Bridgnorth) to build 500 homes. Part of the land to be allocated for housing is currently occupied by Bridgnorth Livestock Market and this would be relocated across the A458 by-pass, and co-located with 6Ha of additional employment land.
- 4.4. In the light of concerns that a housing target of 1200 new homes necessitated development across the A458, and of the views of Tasley Parish Council, Bridgnorth Town Council resolved on 17/7/2012 that it would support a maximum of 1,000 new homes to be built in the Bridgnorth area for the period 2006 – 2026. The response summary for the Spring 2012 consultation indicates that over 70% of respondents in each case opposed (i) The housing target of 1200 homes (ii) the housing site N of Church Lane (iii) the housing site N of Wenlock Road (iv) the allocation of land S of the A458 for employment purposes.

- 4.5. A further consultation was launched by Shropshire Council in July 2013, offering an alternative proposal for consideration. This involved a target of 1,000 homes, of which 250 would be built in Tasley and 50 on windfall sites, in addition to 700 homes already built or committed. The existing Livestock market would no longer be relocated S of the A458, and employment land would be provided on the site N of Wenlock Road previously allocated for housing and local facilities.
- 4.6. In considering its response to the July 2013 consultation, Bridgnorth Town Council sought further clarification from Shropshire Council about the realistic expectation of potential windfall site development in Bridgnorth, and received an acknowledgment that it was not unrealistic to assume that up to 300 new homes could be built on windfall sites in the period 2013 – 2026. In the light of the doubt this cast on the need to allocate any sites for housing to meet an aspiration of 1,000 homes for the 20 year plan period, and of concerns over the impact additional housing would have on Bridgnorth's infrastructure, the Town Council decided at its meeting on 28/10/2013 not to support Shropshire Council's proposals and sought a further meeting with Shropshire Council and Tasley Parish Council to discuss this matter.
- 4.7. Bridgnorth Town Council submitted further comments on this matter, reiterating its earlier response, in December 2012.
- 4.8. The discussions requested by Bridgnorth Town Council in October 2013 have not, up to 25 April 2014, taken place.
- 4.9. It will be noted that the "Compatibility Self – Assessment Checklist" completed by Shropshire Council to determine whether the Core Strategy complied with the National Planning Policy Framework contained the following statement against NPPF core land-use principle no 1 "Be genuinely plan-led, empowering local people to shape their surroundings": *"The Core Strategy has been prepared in consultation with the local community at each key stage of the development and reflects the Sustainable Community Strategy....."*

5. The SAMDev Pre Submission Final Draft

- 5.1. The SAMDev documents set out the levels of development proposed for each settlement, in the Settlement Policies S1-S18. There does not, however, appear to be a reconciliation within the document of how the various settlement policies deliver the total level of development anticipated in the Core Strategy, either for Shropshire as a whole or the individual Spatial Zones. It thus cannot readily be determined whether the detailed SAMDev settlement policies do meet the objective of supporting the Core Strategy.
- 5.2. In the light of the above comments, the proposed levels of development for the identified settlements in East Shropshire have been compared with the indicative figures set out in the notes to Policy CS3 in the Core Strategy (Table 1 below).

Table 1 – East Shropshire Settlement Policies – anticipated levels of development

Settlement	Core Strategy lower no of homes	Core Strategy upper no of homes	SAMDev no of homes	SAMDev employment land Ha
Bridgnorth (S3)	500	1000	1400	19
Shifnal (S15)	500	1000	1250	5
Much Wenlock (Neighbourhood Plan)	N/A*	500	225	0.7
Broseley (S4)	N/A*	500	200	2
Highley (S9)	N/A*	500	200	0.6
Albrighton (S1)	N/A*	500	250	0
Hubs and Clusters			60	1
Total	N/A	4000	3585	28.3

* These settlements are shown as having an indicative scale of development of "<500 homes" in Table 2 of the Core Strategy document.

- 5.3. The above Table indicates that it is proposed to allocate sufficient land for housing development in East Shropshire to exceed slightly the Core Strategy's anticipated level of 3025 – 3575 homes (plus military needs).
- 5.4. The level of housing development proposed for the Bridgnorth area of around 1,400 homes compares with a scale of development per the Core Strategy of 500 to 1,000. The SAMDev document plans for 40% more homes over a 20 year period than the maximum which was considered appropriate (or 87% above the mid-range figure) when the Core Strategy indicative range of development was defined.
- 5.5. Settlement Policy S3 contains the statement: *"5.24 Great concerns were raised by the local community about the concentration of development at Tasley and crossing the bypass, but at the present time the town has little option but to extend in a north-west direction due to Green Belt, topographical and landscape constraints in all other directions. It is recognised that the Green Belt will need to be reviewed in the next Local Plan review"*
- 5.6. Para 5.24 of policy S3 appears to consider that the level of development proposed is necessary to meet Core Strategy requirements. Policy S3 comments further on this: *"5.25 This scale of growth is necessary in order to meet paragraph 182 of the National Planning Policy Framework (NPPF) requirement to plan positively to meet Shropshire's housing, employment and infrastructure needs. The proposed allocations provide a balanced scheme that will deliver a mix of employment and residential development along with road network improvements and community facilities. The planned, comprehensive scheme represented by the allocations at Tasley (BRID020a, BRID020b, ELR011/a, ELR011/b) will deliver more for the town and local community than a collection of smaller, ad hoc proposals"*.

- 5.7. It must be assumed that the allocations of anticipated levels of development to the various Spatial Zones in the Core Strategy were intended to *“plan positively to meet Shropshire’s housing, employment and infrastructure needs”*. The level of housing development proposed for Bridgnorth is substantially in excess of that identified for the settlement in the Core Strategy (by 400 homes), and the total level of housing development for East Shropshire (per Table 1, above) appears to be at the top of the range of potential levels of development identified in the Core Strategy (and would still be within it if the excess provision of 400 homes in Bridgnorth were deleted). It is unclear which such an excessive allocation of new housing development to Bridgnorth is *“needed to plan positively to meet Shropshire’s housing...needs.”*
- 5.8. It will be appreciated that a development level of 1,000 homes for the Bridgnorth area over 20 year SAMDev plan period equates to an average of 50 new homes a year, compared with the 1998 – 2008 average of 28.4 homes a year, a 76% increase. This would appear to indicate that the Bridgnorth area would be supporting Shropshire’s wider housing needs, were the SAMDev proposed level of housing development to revert to the original Core Strategy proposals.
- 5.9. Section 4 above clearly indicates that the Community does not support the development of more than 1,000 homes in the Bridgnorth area over the period 2006 – 2026, and that in providing for a higher level of housing development the SAMDev DPD appears to be over-riding those concerns for reasons which appear neither adequately explained nor objectively justified. This suggests that in this respect the **SAMDev DPD has not been “Positively Prepared”** in that it appears not to comply with Land Use principle no 1 *“Be genuinely planned, empowering local people to shape their surroundings.”* **It also does not appear to be “Justified”** as defined in the Guidance notes to making representations by *“4.3 This means that the SAMDev Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence, which includes: □ • Evidence of participation of the local community and others having a stake in the area □ • Research/fact finding: the choices made in the plan are backed up by facts”*

6. Action needed to make the SAMDev DPD address the community’s concerns.

- 6.1. The SAMDev proposals include relocating the existing Bridgnorth Livestock market across the A458 bypass (ELR011/b), which would ostensibly be needed to free up the existing site for housing and other uses (BRID001/BRID020b). This would not be necessary if the housing allocation for Bridgnorth were reduced to 1,000 homes, and both sites could be deleted from the proposals map.
- 6.2. Careful consideration needs to be given to the level of development which can realistically be expected to arise on “windfall” sites in the Bridgnorth area. Subject to the intended future use of Shropshire Council’s Westgate site, it may be realistic to assume that 300 homes could be built on windfall sites in the period 2013-2026, in which case allocation BRID020a may be deleted.

- 6.3. The community clearly has strong concerns over the location of employment land at ELR011/a (6.7Ha), though there is support for developing more local employment. The realistic requirement for a site allocation, and evidence of the prospects of it being taken up, should therefore be reviewed. It should be noted that the take – up of 9.5 Ha of employment land allocated in the Bridgnorth District Local Plan 2006 appears only to have been limited to around 1.1 Ha at Faraday Drive (and possibly some development at Stanmore Industrial Estate), and that the current SAMDev DPD additionally allocates 1.5 Ha of employment land at Old Worcester Road (W039).