

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

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Name and Organisation:	Bridgnorth Town Council
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	Whole Document
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Various references such as "this option is likely to have a higher positive impact" are made throughout the document but are unsupported e.g. page 24 item 5 contains "This option would likely have a higher positive impact on the ability to facilitate the provision of new forms of sustainable transportgiven that many services and facilities require a 'critical population mass' to maintain viability and sustainability". Such statements would be more credible if evidenced by reference to documented experience

(Please continue on a separate sheet if necessary)

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Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	12.22 and 12.23
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Q3. Do you consider the document(s) are:

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Q4. Please detail your comments on the specified document(s).

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12.24 refers to information contained in the Housing Topic Paper GC4i (produced in 2022). Part of the information relating to migration patterns is reproduced as figures 12.2 and 12.3, but this is selective and to assess the relevance of this information it is necessary to refer back to the earlier report, which gives data on the scale of migration and the base period for the data. The need to refer back to previous documents does not facilitate consultees providing informed responses.

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Paragraph(s):	12.22 and 12.23
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Figure 7 of GC4i identifies average migration into Shropshire from the Black Country as being 1,175 people a year over the period 2016 to 2020, of whom 40% come from Wolverhampton and 30% from Dudley, with much smaller numbers from Sandwell and Walsall. By extrapolation, Bridgnorth would be the destination for around 294 people a year migrating from the Black Country. Figure 8 of GC4i identifies average migration from Shropshire to the Black Country as 421 people a year, by extrapolation around 93 people a year would migrate from Bridgnorth to the Black Country. This gives average annual net migration into the Bridgnorth area from the Black Country of around 201 people. The source of the migration into Bridgnorth from the individual Black Country areas is not itemised. It is necessary to have an understanding of the scale of existing migration to form a judgement as to the appropriateness of an additional level of development to meet future Black Country unmet housing needs proposed for a settlement.

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Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	12.1 to 12.59
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Q3. Do you consider the document(s) are:

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- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

No reference is made to the scale of likely unmet needs and where they are expected to arise: The Black Country is treated as a single location with statements identifying, for example, that Bridgnorth is close to the Black Country. The Black Country authorities are not now preparing a single Black Country plan and have started to prepare their own individual plans. Presumably updated Duty to Co-operate discussions with the individual Black Country authorities will be required in due course. Prior to the cessation of work on the Black Country Plan it was identified that the major housing shortfall would arise in Sandwell, which historically has been around 16% of the migration into Shropshire. Dudley was projected to have a surplus of delivery over requirements. Wolverhampton had a deficit but this was heavily influenced by its housing requirement being uplifted by 35% as one of the country's 20 largest cities; the government's expectation is that the 35% uplift is delivered in the city, not exported to neighbouring authorities. Sandwell and Dudley have now carried out regulation 18 consultations on drafts of their local plans, which both now run to 2041; Sandwell is continuing to forecast a substantial housing shortfall, whilst for Dudley it is 1,078 over their plan period. Wolverhampton has carried out an Issues and Options Consultation; there is a potential shortfall of 11,400 homes, but this includes the 35% city uplift.

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Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	12.87
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

The contribution to meet the "Black Country" needs simply allows homes to be built, it does not provide a mechanism which facilitates migration. Whether the proposed scale of Shropshire contribution to Black Country Housing needs, at the locations proposed, is realistic in the context of established migration patterns from individual areas within the Black Country, particularly those where a large shortfall is projected to arise, has not been adequately addressed. For example, 600 homes at the proposed Tasley Garden Village site are proposed to be deemed to be a contribution to meeting Black Country unmet needs. Earlier comments suggest that the baseline housing need for Bridgnorth (based on ONS forecasts which allow for established migration patterns) reflects a net 201 people a year moving into Bridgnorth from the Black Country. If the 600 homes at Tasley are to be built from adoption of the Plan (potentially 2026) to 2038, that would equate to 50 homes a year. These would potentially accommodate perhaps 110 additional migrants a year, a 55% increase on established levels.

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Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	Page 302 footnote
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Contains the statement that "The draft settlement Policies S1 to S20 implement draft Policy SP2 (they show how SP2 applies, but they are not considered to represent reasonable alternatives for SA purposes), as such they were not subject to separate SA within the Sustainability Appraisal and Site Assessment Environmental Report undertaken to inform the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan." It doesn't appear to be proposed to conduct Sustainability Appraisals of the individual settlement strategies in Shropshire, relying on the overall conclusions of the assessment of the Shropshire spatial approach and the individual site appraisals. Consideration should be given to whether the individual site assessments provide an adequate assessment of the sustainability of the proposed scale of development for the settlement in which they are situated.

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Paragraph(s):	Appendices
---------------	------------

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It is difficult to comment meaningfully on the updated site appraisals. The consultation material did not include a map so it is difficult to identify which sites are being assessed, and there is no indication provided of what has been changed since the previous version. This gives rise to a concern about whether consultation respondees have been given sufficient information, in a readily accessible format to make an informed comment.

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Paragraph(s):	Appendix 1
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In conducting the Stage 2a assessment no account is taken of the size of the site and the scores are not weighted by the size/ scale of potential development. For example, there is a criterion of whether there is a bus stop with a "regular" peak hour service within 480 metres of the site boundary, which can attract a positive score if there is and a negative score if there isn't; whilst this would be significant for a small site, for a very large site it would have little relevance since a large development would merit a bespoke public transport solution.

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Paragraph(s):	Appendix 1
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A "Black Country Sustainability Conclusion" has been added to the Stage 2a assessment for individual sites but it is not clear how this has been arrived at.

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Paragraph(s):	Appendix 1
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The general impression is that overall Bridgnorth is regarded as suitable to accommodate homes being built to address the needs which cannot be met within the Black Country, and proximity and transport links appear to be a key factor. The Black Country is referred to in general terms rather than as specific places within it, notwithstanding that the individual boroughs are now preparing separate plans. Wolverhampton and Dudley are more accessible from Bridgnorth than Sandwell or Walsall, but there are differences in accessibility from Bridgnorth between Wolverhampton and Dudley. The centre of either is a 35 - 40 minute journey by car from Bridgnorth and the differences between locations in the Bridgnorth area in accessibility to either are likely to be small relative to the total journey/ distance. The differences between individual sites in their effectiveness at meeting Black Country needs should thus largely be discounted and regarded as subsidiary to local impacts e.g. extra road traffic has more of an impact on the local area at some places than at others.

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BRD030 is given a positive score for "Primary School within 480m of the site boundary", "Amenity Green Space within 480m of the site boundary", "Public Transport Node within 480m of the site boundary" and "Site wholly/ partly Brownfield" at Stage 2a. The description of the site as being Brownfield is disputed. The 480m "test" is intended to be walking distance, the location of a Primary School within 480m of the site boundary by a practical walking route is disputed. In any event, these attributes make minimal contributions to the sustainability of a large site such as this and these scores should be discounted. The score should be reduced by 4 to -12, which would make the site "Poor" on settlement sustainability grounds.

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Paragraph(s):	Appendix 4 Pages 61 to 65 (BRD030)
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Q3. Do you consider the document(s) are:

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The proposed policy on "Housing Provision for Older People and those with Disabilities and Special Needs" would require 75% of the dwellings to be wheelchair accessible or adaptable "unless site-specific factors indicate that step-free access cannot be achieved". It would also require at least 210 dwellings on the site to be "a form of specialist housing for older people and/or those with disabilities and special needs". It does not appear to have been assessed whether these new requirements have implications for the sustainability of development on BRD030. The topography of the site may present an issue with step-free access and the poor connectivity with existing Bridgnorth facilities may impede the development of specialist accommodation.

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Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	6.9, 7.9
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Please be as precise as possible.

References to the adopted Shropshire Local Plan as a baseline are confusing. The adopted Plan only runs to 2026 so does not provide a baseline for the remaining 12 years of the draft plan. It is assumed that the reference should be to the submission draft Local Plan, but this should be clarified.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.