

## 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)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11<sup>th</sup> June 2024**.

Name and Organisation:	Darren Hodson
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### Q1. To which document(s) does this response relate?

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

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

Paragraph(s):	See relevant text
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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.**

1 Existing SAMDev / Proposed housing development  
 For the Local Plan to have been justified as an appropriate strategy based upon credible evidence i.e.

- 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 Bridgnorth and the surrounding Parishes, which includes Worfield & Rudge Parish in significance. A decision regarding the appropriateness of the plan cannot therefore be formed.
- There is no justification for the level of growth in employment assumed in the draft Local Plan.
- It lacks justification for an arbitrary allocation of 1800, with 600 allocated to the Black Country ,proposed dwellings in the Bridgnorth place plan area, given part of this allocation, 500 dwellings, forms the remaining allocation of SAMDev.
- 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 periods.
- A strategic highways assessment for the Bridgnorth area, including an explanation of how Bridgnorth 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. Particularly no published assessment has been made available of Stanmore Business park indicating how a further 770 employees will enter or leave the site.

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/any level of growth
- No credible evidence has been made available demonstrating the sustainability of the proposed plan based upon past delivery of jobs from the current SAMDev allocation for the Bridgnorth Place plan area.
- It remains unclear as to the true housing needs of the West Midlands. We do not think that this has been accurately investigated and proved.

Sustainability in public transport in Shropshire is problematic and not something that the Local Plan tackles. Communities are by and large remote from each other. Young families without access to two cars risk being isolated since the opportunities for walking safely are rare indeed. Again, investment in infrastructure is essential to the implementation of any plan.

Fulfilling the housing need for the West Midlands and further employment both require the improvements of the road network throughout Shropshire and the provision of a reliable bus service across the county. Without underpinning the suggested development with the transport logistics, then neither a residential or business development strategy will work.

## 2. Infrastructure in respect of Highways

The availability of sufficient infrastructure underpins good plan making, and quite rightly is one of the issues which attracts comments at consultation. The Local Transport Plan was not available for consideration of the Plan at Regulation 18 or Regulation 19, or at the time of the Shropshire Cabinets decision and casts doubt on being able to make an informed decision about the soundness of the plan.

The strategic approach also responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors, utilising existing road and rail connections. Bridgnorth is not on a strategic corridor, 16.87 d pg 145 Updated housing and land topic paper April 2024. Investing in Strategic Transport Corridors in The Marches, The Marches Local Enterprise Partnership May/ June 2016, which is an underpinning document for The Marches Economic Growth Strategy for Shropshire 2017–2021 advised that Bridgnorth is not positioned on a strategic transport corridor. For clarity the A454 between Bridgnorth and Wolverhampton is not mentioned in the document as a strategic route. Many of the assumptions and growth forecasts for Bridgnorth and adjoining Parishes including Worfield & Rudge, both housing and industrial growth are based on the assumption that the town is positioned on a strategic transport corridor to the Black Country. This casts doubt on Shropshire Cabinet being able to make an informed decision, with the information being incorrect or unavailable.

## 3. Provision of adequate workplace and commercial opportunities.

The level of employment development proposed for 2016 – 2038 for the Bridgnorth area is not clear. 49Ha of employment land equating to circa 3290 additional jobs 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), 11.5Ha of Green Belt land adjacent to Stanmore Industrial Estate, equating to an additional circa 770 jobs, and 16Ha employment land at the proposed Tasley Garden Village. Using the figure of 49Ha this comprises 15.3% of the county's total, however; by contrast the residential development guideline for Bridgnorth is 5.3% 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.) this contrasts against the expectation of 49Ha over 22 years equating to an average of 2.2Ha p.a. It is claimed in a previous 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".

I 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 transport connectivity and whether this rate of growth is deliverable over the plan period.

I 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 calculation 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 in Shropshire 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.

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.

The Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report considers housing sites and employment sites in isolation during the assessment of Good, Fair and Poor rankings, does not consider STC002 nor P58a as being in the Greenbelt which they are, nor locality and transport routes between preferred housing sites and employment sites within the place plan area as part of the carbon footprint assessment, environment mitigation measures are not highlighted. The draft Shropshire plan pg 185 indicates that compensatory provision will be made

due to loss of 11.5ha in the Greenbelt and highlights that these provisions will be though Investment in the quality of the Country Park. It is unclear how cumulatively 11.5 ha can be compensated for in a preexisting and well established Country Park of 40ha. Note that STC002 was bulldozed post regulation 18 with no buffer zone being established between housing and employment site subsequently complaints of pollution have increased.

Challenging the noted exceptional circumstance for removal of STC002 and P58a from the Green Belt, "Green Belt Topic Paper April 2024" Section 8.4 justifies the removal of the land from the greenbelt by justifying "choice and competition", this highlights that there are alternative sites proposed within the plan that can meet the need, therefore negating the exceptional circumstance. Section 8.11, 8.12 justifies the lack of need of safe guarded land by referencing future options of BRD030, again this highlights suitable alternatives. Page 30 incorrectly references the establishment of planning application for an advanced metals recovery pyrolysis plant sited at building 10, formally MCMT, this building was established as an advanced engineering facility. Circular Resources " pyrolysis plant developers "vacated the site with occupancy being transferred to Seal Fuels providing domestic fuels as well as pet food, with no focus on Engineering or Advanced manufacture. Similarly the Square on Stanmore Business park gained planning permission for 10 additional units however none have been built to date and the area is used as a storage yard for freight lorry trailers, again no focus on Engineering or Advanced manufacture. These by way of example demonstrate that building 10 and other areas on the site are not supporting the primary exceptional circumstance of 8.26 (i) Stanmore Business Park represents a 'centre of excellence for engineering and advanced manufacturing', hosting a range of businesses within and associated with engineering and advanced manufacturing that benefit from their co-location on the site.

I do support expansion of existing engineering companies 8.26 (iii) however as per Building 10 example and the Square, market forces will dictate occupancy. Therefore, release of Greenbelt land for non-engineering-based companies does not meet the exceptional circumstance stated in section 8.26 considering alternative sites exist. Development options for existing companies need to consider tighter control ensuring strategic requirements are fully met.

A review of the mix of companies based at Stanmore Business park highlights a current combination, by example but not limited to, of Warehouse and Freight, food and beverage, a significant number of car repairs and restoration and parts based companies as well as car storage facilities and service based companies and a few Engineering based companies. It is difficult to support the assertion that Advanced Engineering and Manufacture is the sole sector of importance on the site as such I question the Exceptional Circumstance proposed by Shropshire Council to take further land out of the Greenbelt when I would naturally expect market forces to define which new companies join the site. Building 10 is a good example of a state of the art Engineering facility becoming a domestic fuels warehouse which could have been located elsewhere.

#### 4..Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs

I am aware of the ageing demographic across the Parish. The large development at Tasley represents an opportunity to increase the provision of supported living accommodation much lauded in the Plan. One cautionary note to add is that the increase of supported living also increases the necessity for adequate support either in the form of district nurses, carers and/or medical staff. Whilst we do need increased support for elderly people with complex needs, the area also needs the appropriate infrastructure to underpin this development.



As ever, are we sure that any large development will be made to invest in such infrastructure to achieve a positive outcome for all.

In summary, I do not feel that there is evidence to support the proposition that the planned level of development in the Bridgnorth and surrounding Parishes is deliverable over the plan contained within the proposition currently being recommended to Shropshire Council. The Interim Planning Policy and Strategy Manager for Shropshire Council has stated that “the bar is high” for seeking change to the Greenbelt. This statement was made regarding the preference of the Tasley site over the Stanmore site in respect of development. Yet the proposed expansion of Stanmore Industrial estate would require change to this Greenbelt policy.

This is an inconsistency of approach which requires justification.

Key evidence is missing from this draft submission, which would make this plan legally sound. The strategy selected must be backed up with proportionate evidence justifying the strategy, all alternatives must be considered and Shropshire Council must demonstrate that the selected strategy is truly community lead.

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 lead.

I recommend that the plan is modified, in line with the proposals in the 1st edition of the Bridgnorth Plan. In brief I 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, no single site is selected, and the Regulation 19 is repeated ensuring community involvement. I would also recommend that no greenbelt land is removed at this time due to the evidenced lack of evidence of need of additional land specifically for Engineering and Advanced Manufacturing and lack of evident control of occupancy. This situation should be monitored over the next 5 years with more robust evidence being gathered, community involvement should be increased and resident complaints regarding noise and airbourne pollution should be addressed.

I hope that my concerns over the failure to be Legally Compliant can be overcome, preferably in the way proposed above. I am committed to working constructively with Shropshire Council to achieve this.

If it cannot be achieved, then I 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 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.*

