

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 11th June 2024**.

Name and Organisation:	Jonathan Burns, Pegasus Group
------------------------	-------------------------------

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 type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" 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):	Sections 7, 8, 9 and 16
---------------	-------------------------

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.

Please see representations report R011v2.

(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.

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 11th June 2024**.

Name and Organisation:	Jonathan Burns, Pegasus Group
------------------------	-------------------------------

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):	Sections 6 and 12, Appendix 1 and 12.
---------------	---------------------------------------

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.

Please see representations report R011v2.

(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.

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 11th June 2024**.

Name and Organisation:	Jonathan Burns, Pegasus Group
------------------------	-------------------------------

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 type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" 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 policy
---------------	--------------

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.

Please see representations report R011v2.

(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.

Representations to Shropshire Local Plan additional submission documents.

Tasley Garden Village, Bridgnorth.

On behalf of Bloor Homes and Taylor Wimpey UK Ltd.

Date: June 2024 | Pegasus Ref: P20-1800_R011v2 PL_JB

Author: Jonathan Burns



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	June 2024	Jonathan Burns	Jonathan Burns	N/A
2	June 2024	Jonathan Burns	Jonathan Burns	Client comments



Contents.

1. Executive Summary.....	3
2. Introduction.....	4
3. GC44 – Shropshire Local Plan Additional Sustainability Appraisal Report (April 2024).	5
6. Unmet Housing Need Forecast to Arise in the Black Country.....	5
12. Summary of SA and Site Assessment: Site(s) to Accommodate Unmet Needs.....	5
Summary: Process Undertaken to Identify a Reasonable Assessment Geography	5
Summary of the Additional SA and Site Assessment Work	8
Appendix 1 – Updated Stage 2a: Housing Sustainability Appraisal Site Assessment	10
Appendix 4: Updated Stage 3 Site Assessment – Bridgnorth Principal Centre	11
4. GC45 – Housing and Employment Topic Paper.	12
7. The Housing Requirement.....	12
Identifying the Proposed Housing Requirement	12
The Proposed Housing Requirement and Reasons for the Proposed Housing Requirement..	14
Implications of the Proposed Housing Requirement	14
8. Accommodating the Proposed Uplift to the Housing Requirement	14
Options to Accommodate the Proposed Uplift to the Housing Requirement	14
9. Accommodating the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country	16
Implications of the Proposed Sites Identified to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country	16
16. Accommodating the Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country	17
5. GC25 – Draft DP Policy: Housing Provision for Older People and those with Disabilities and Special Needs.....	18

1. Executive Summary.

1.1. These representations are submitted on behalf of Bloor Homes Ltd and Taylor Wimpey UK Ltd in respect of their land interests at Tasley Garden Village, Bridgnorth (BRD030). The key matters raised in response to this consultation are as follows:

- The reasonable assessment geography for sites to meet the unmet needs is considered appropriate. However, from the data presented in the Topic Paper and Sustainability Appraisal Report, it is clear that the functional relationship with the Black Country is significantly greater in the eastern areas of this area.
- Of those sites identified to meet the unmet housing needs of the Black Country, it is clear that Bridgnorth, and specifically Tasley Garden Village, has the best functional relationship with the Black Country authorities and is best placed to meet this need. This is clear when reviewing the evidence on migration, commuting and the geographic proximity to the Black Country. This data is provided in Tables 2–4.
- Given the strong functional link, and level of services and employment opportunities in Bridgnorth, a greater proportion of these unmet housing needs should be accommodated by the Tasley Garden Village site, including the land identified as Potential Future Direction of Growth. This would require an increase to the overall housing numbers at Tasley Garden Village to ensure that these needs are met alongside the needs of existing Shropshire residents. In considering the options to accommodate this uplift it is considered that the estimated completion rates for Tasley Garden Village are overly cautious. It is expected that the Tasley Garden Village development would be completed by 2034/35 at the latest.
- Given delays through the examination process, there is a requirement to extend the Local Plan period to 2040 to ensure it plans for at least 15–years post adoption in accordance with NPPF Para. 22. It is considered that sufficient sites to accommodate this need could be identified in a timely manner without causing unnecessary delay to the adoption of the Local Plan.
- To ensure that sites deliver an appropriate mix of housing to help meet these unmet needs, the housing mix policy (DPI) will need to be updated to recognise the different housing requirements of those most likely to move from the Black Country to Shropshire. Census 2021 data highlights that those migrating from Black Country authorities are younger and more likely to be of a working–age than the current population of Shropshire and will therefore have different housing requirements.
- The draft policy on specialist housing provision places a requirement for 20% of homes to be delivered as specialist homes on sites over 250 dwellings. This has not been tested through the viability work that underpins the Local Plan and no evidence has been provided on the suitability of this new policy approach, including considerations of how such provision is currently delivered in Shropshire.
- The wording of part 19 of this draft policy appears to place restrictions on housing delivery on allocated sites which exceed either assumed site allocation capacity or result in the settlement housing provision being exceeded. This would unnecessarily restrict housing delivery and contradict the recognition that the overall housing requirement is a minimum figure.



2. Introduction.

- 2.1. Pegasus Group is instructed by Bloor Homes Ltd (Bloor) and Taylor Wimpey UK Ltd (Taylor Wimpey) to make representations to additional documents produced by Shropshire Council in respect of the examination of the Shropshire Local Plan 2016 to 2038 (“the Draft Local Plan”).
- 2.2. These representations are submitted in respect of our client’s land interests at Tasley Garden Village, Bridgnorth. Tasley Garden Village is identified as an allocation with the draft Shropshire Local Plan as a comprehensive mixed use sustainable urban extension (BRDO30) and the area to the west identified as a Potential Future Direction of Growth area (Schedule S3.1(iii) identified under Policy S3 – Bridgnorth Place Plan Area.
- 2.3. Representations have previously been submitted on behalf of Taylor Wimpey owing to their land control position at that time. However, in late 2023 Bloor assumed control of the majority of the Tasley Garden Village site and Potential Future Direction of Growth area. As such Bloor is now leading on the overall promotion and delivery of the scheme. Taylor Wimpey have maintained control over a smaller part of the site and will be a development partner of Bloor moving forward. Given this, representations are now submitted on behalf of both parties.
- 2.4. Bloor is the largest privately owned housebuilder in the UK, completing over 4,200 homes across its nine regions in 2023. Bloor has over 50 years continuous experience in promoting and developing major new housing and mixed-use schemes, the majority of which are delivered from its strategic land portfolio. The Company is focussed on design and build quality, timely delivery of supporting infrastructure, and the creation of sustainable new neighbourhoods and communities that stand the test of time.
- 2.5. Taylor Wimpey is a dedicated homebuilding company with over 125 years’ experience with expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure. With extensive experience of building homes and communities, Taylor Wimpey continues to be at the forefront of the industry in building quality and design and has significant experience delivering schemes such as Tasley Garden Village, including alongside other developers.
- 2.6. For ease of reference, these representations provide comments on the additional/amended consultation documents under separate sections within this document. We comment on the following:
 - GC44 – Shropshire Local Plan Additional Sustainability Appraisal Report (April 2024).
 - GC45 – Shropshire Local Plan Housing and Employment Topic Paper (April 2024).
 - GC25 – Draft DP Policy: Housing Provision for Older People and those with Disabilities and Special Needs.

3. GC44 – Shropshire Local Plan Additional Sustainability Appraisal Report (April 2024).

- 3.1. The following sets out our comments on the above document. For ease of reference, comments are split between the different sections/appendices of the report and presented in order.

6. Unmet Housing Need Forecast to Arise in the Black Country

- 3.2. Two options to helping meet unmet housing needs arising in the Black Country are considered through the Sustainability Appraisal (SA) report. These are summarised in Para. 6.8; and effectively assess no contribution (option 1) and the contribution proposed through the Local Plan of 1,500 dwellings (option 2). The same approach is also taken in respect of employment land needs.
- 3.3. It is considered that the two options considered are appropriate reasonable alternatives to be considered through the SA having regard to the justification provided at Paras. 6.2–6.8 of the SA and the various background documents on the Duty to Cooperate process with the Black Country authorities.
- 3.4. Given the discussions and requests made of Shropshire Council it appears that a consideration of an alternative figure of unmet need, whether that be lower or greater than 1,500 homes, would not be a reasonable alternative as requests for an alternative number of homes have not been made by the Black Country authorities as set out in the relevant Statement of Common Ground (EVO41).

12. Summary of SA and Site Assessment: Site(s) to Accommodate Unmet Needs.

- 3.5. This section of the assessment sets out the methodology and ultimate SA assessment of sites to accommodate the employment land and homes that form the contribution to the unmet needs of the Black Country.

Summary: Process Undertaken to Identify a Reasonable Assessment Geography

- 3.6. Dealing first with the methodology, the updated SA sets out process undertaken to identify a 'Reasonable Assessment Geography' within which potential sites could contribute to the unmet needs of the Black Country. Four main considerations have been used in determining this reasonable assessment geography which we comment on turn in the following paragraphs.
- 3.7. The first consideration relates to the **geographic proximity and location of road and rail transport links**. The approach appears to be reasonable, and the key road and rail links identified are appropriate including the A454 and A458 corridors which provide a direct link between Bridgnorth and Wolverhampton and Dudley respectively, with Walsall and Sandwell beyond.
- 3.8. The second consideration relates to **migration patterns** at a sub-area basis, split by Place Plan Areas. Whilst this is a helpful and appropriate consideration, the data presented relies

upon 2011 census migration data as produced in the original Housing Topic Paper (GC4i). Since the Housing Topic Paper was published, 2021 census data has been published on migration patterns in October 2023 through the Origin–destination data release.

- 3.9. Given this, it would have been beneficial to review the more up-to-date migration data alongside the 2011 census data to give a fuller picture of migration patterns from the Black Country into the different place plan areas within Shropshire. Whilst this is not included, in order to assist the Council and examination process, the following provides a summary of the census 2021 data based on in-migration from the Black Country authorities into each Place Plan Area. As with the 2011 data presented in the Housing Topic Paper (GC4i), as data is only presented at Middle Super Output Areas (MSOA), which do not necessarily fit with the Place Plan Areas defined in the draft Local Plan, we have used a best fit approach having regard to how the MSOA boundaries relate to the different Place Plan Areas, having particular regard to how they fit with the main urban concentrations within each area¹.

Table 1 – Internal migration from the Black Country Authorities to Shropshire at Place Plan areas – Census 2021 and Census 2011

Place Plan Area	2021 Census		2011 Census
	Count (persons)	%	%
Albrighton	141	13.4%	8.7%
Broseley	63	6.0%	8.9%
Bridgnorth	222	21.2%	25.4%
Cleobury Mortimer	92	8.8%	3.9%
Ludlow	10	1.0%	4.6%
Oswestry	60	5.7%	5.0%
Shrewsbury	139	13.3%	13.7%
Shifnal	139	13.3%	3.8%
Wem	26	2.5%	4.6%
Other	157	15.0%	21.4%
Albrighton	141	13.4%	8.7%
Total	1,049	100%	100%

- 3.10. The Census data provides migration patterns for a 1-year period, with the data comparing a respondent’s usual place of residence on Census day, compared with that 1 year before. The 2021 and 2011 Census data is useful data and an important consideration in determining where unmet need from the Black Country authorities can be met.
- 3.11. As can be seen in Table 1, migration patterns have altered between the two data sets with significant increases in the proportion of in-migration from the Black Country to the Shifnal and Albrighton Place Plan Areas between 2011 and 2021 data. However, Bridgnorth Place Plan Area remains the most popular destination for people migrating from the Black Country highlighting its strong links with the Black Country authorities.
- 3.12. In addition, it is also important to note that total in-migration from the Black Country authorities to Shropshire increased by around 32% between 2011 and 2021 census dates

¹ As some MSOA geographies will have changed since the 2011 census, there may be some differences between which MSOA’s are included within each Place Plan Area when compared with the 2011 census analysis contained in the Housing Topic Paper.

with an increase from 796 people in 2011 to 1,049 in 2021. As such, whilst the proportion of in-migration into Bridgnorth fell as a proportion of total in-migration from the Black Country, actual population migration into the Bridgnorth Place Plan Area was higher in 2021 than in 2011 with 222 people migrating into Bridgnorth in 2021, compared with 202 in 2011.

- 3.13. In considering this, it is also important to consider possible reasons why there may have been higher or lower proportions of in-migration into different Place Plan areas between the 2021 and 2011 Census data.
- 3.14. One determining factor will no doubt be the availability of housing to accommodate those wishing to relocate from the Black Country. Therefore to understand this further it is useful to consider new housing completions within different place plan areas. Whilst those relocating from the Black Country do not necessarily move to a new build home, clearly the delivery of new homes will also free up existing housing stock.
- 3.15. To explore this further we have reviewed data from the Energy Performance Certificate open database for new dwellings in Bridgnorth in the two years leading up to the 2021 and 2011 Census. During the 2-year period prior to the 2021 census just 54 new homes were delivered within the Bridgnorth Place Plan area² with this limited housing delivery partly down to delays with delivery on the SAMDev site allocations. In comparison, the two years leading up to the 2011 Census, which saw a greater proportion of in-migration to Bridgnorth, there were a total of 297 new homes completed.
- 3.16. To further understand this relationship we have also considered new home completions in Shifnal which, as already highlighted, saw a significant increase in in-migration from Black Country authorities. In the two years leading up to the 2021 Census a total of 327 new homes were completed, significantly greater than the same time period in Bridgnorth and well above the level of completions seen in the 2 years prior to the 2011 Census (63 new homes).
- 3.17. Whilst this is a small-dataset for comparison purposes, this does serve to highlight a correlation between the delivery of new homes and in-migration into an area noting that the actual availability of housing will be a key factor in the decision for moving into an area. This also helps to highlight that despite very limited levels of housing growth prior to the 2021 Census, Bridgnorth remained a particularly popular area for in-migration from the Black Country and its attraction remained despite this.
- 3.18. Another factor considered through the assessment relates to **commuting patterns** relying upon sub-area commuting patterns. It is agreed that this is a helpful indicator with this highlighting that the Bridgnorth Place Plan Area is responsible for the majority of commuting to and from the Black Country. The data presented is all based on 2011 Census data and presented in the Housing Topic Paper. Whilst 2021 Census commuting pattern data is now available; this was undertaken during the COVID-19 pandemic which saw a significant increase in home working and as a result commuting patterns are unlikely to be representative of typical commuting data outside of the pandemic. As such, it appears appropriate to continue to rely upon this 2011 Census data as the best source of such sub-area data.

² Postcode sectors WV15 and WV16 relied upon as the best match.

3.19. Having regard to these various considerations the SA concludes that the eastern and central parts of Shropshire have the strongest functional relationship with the Black Country and that the appropriate geography to meet needs should be in the following Place Plan Areas:

- Albrighton.
- Bridgnorth.
- Broseley.
- Highley.
- Much Wenlock.
- Shifnal.
- Shrewsbury.

3.20. It is considered that this is a reasonable assessment geography although noting that eastern areas of the Shropshire do have a notably greater functional relationship with the Black Country authorities than central areas. In particular, Bridgnorth is clearly best placed to meet this need given the clear functional relationship and migration patterns highlighting that it has continued to be the most popular Place Plan Area for those migrating from the Black Country.

3.21. In respect of housing, Paras 12.32–12.34 set out why sites to meet the unmet housing needs will be focused on urban areas (Strategic, Principal and Key Centres) or strategic settlements/sites. This approach recognises the urban focus of the draft Local Plan and highlights the ability for such locations to sustainably accommodate such development whilst being the locations most likely to meet the needs of Black Country households. We support and agree with this approach and reasoning.

3.22. The methodology for the additional SA and site assessment work in relation to this appropriate geography area, including the review of all potential sites is considered appropriate.

Summary of the Additional SA and Site Assessment Work

3.23. We do not raise any significant concerns or issues regarding the assessments made in respect of each site to accommodate the unmet housing and employment needs of the Black Country authorities. However, we do have concerns about how the proportion of unmet housing need has been distributed between the three sites. For ease of reference the proposed split is as follows:

- BRD030 Tasley Garden Village – 600 dwellings.
- SHRO60, SHR158 & SHR161 Land between Mytton Oak Road and Hanwood Road, Shrewsbury – 300 dwellings.
- IRN001 Former Ironbridge Power Station – 600 dwellings.

- 3.24. In respect of our client’s land interests at Tasley Garden Village (Site ref. BRDO30), the identification of the site to meet some of this unmet need is supported noting the clear functional relationship between Bridgnorth and the Black Country which sees significant levels of existing in-migration as already highlighted both in the SA, Topic Paper and these representations, whilst also benefitting from direct road access to Wolverhampton and Dudley.
- 3.25. In considering the specific split of unmet housing needs it is important to compare these with the evidence produced in the SA (and repeated in the Housing Topic Paper) relating to the four key considerations to determine an appropriate geographical area of search as set out in Section 12 of the SA. These are as follows:
- Geographic proximity and the location of main road and rail transport links;
 - Migration patterns;
 - Commuting patterns; and,
 - Travel to Work Areas.
- 3.26. A detailed assessment or consideration against these four key considerations is not produced in either the SA or Housing and Employment Topic Paper (GC45) with both instead relying upon the same summary table to provide comment on these factors, and planning judgements. As such, the following provides a summary of these considerations based on the evidence presented in the SA (and Housing and Employment Topic Paper), plus the additional up-to-date evidence we have presented in these representations. For ease of reference these are presented in a series of tables.

Table 2 – Geographic proximity and rail links between identified sites and Wolverhampton and Dudley³.

Place Plan Area	Wolverhampton			Dudley		
	Travel distance (miles) ⁴	Approx. travel time (mins) ⁵	Rail travel time (mins) ⁶	Travel distance (miles)	Approx. travel time (mins)	Rail travel time (mins)
Bridgnorth	14.6	26	N/A	16.9	30	N/A
Ironbridge	19.0	35	N/A	21.3	40	N/A
Shrewsbury	32.9	45	36	38.0	55	48

³ Dudley and Wolverhampton used as the two closest Black Country authorities to Shropshire.

⁴ Calculated from town/city centre of each named destination (driving distance).

⁵ Calculated from town/city centre of each named town outside of peak hours – minimum travel time used.

⁶ Fastest rail travel times between stations within centre of each named town based on National Rail Enquiries data.

Table 3 – Migration patterns from Black Country Authorities to Shropshire at Sub-Shropshire Place Plan Area level.

Place Plan Area	2021 Census ⁷		2011 Census ⁸	
	Proportion of in-migration ⁹	Count (persons)	Proportion of in-migration	Count (persons)
Bridgnorth	21.2%	222	25.4%	202
Ironbridge	8.0%	84	8.9%	71
Shrewsbury	13.3%	139	13.7%	109

Table 4 – Shropshire commuting patterns to and from Black Country Authorities.

Place Plan Area	Commuting from Black Country Authorities to Shropshire ¹⁰		Commuting from Shropshire to Black Country Authorities ¹¹	
	Proportion of commuters ¹²	Count (persons)	Proportion of commuters ¹³	Count (persons)
Bridgnorth	34.9%	770	30.7%	1419
Ironbridge	2.3%	50	8.9%	413
Shrewsbury	18.6%	410	11.9%	548

- 3.27. Tables 2–4 summarise the relevant considerations at a place plan level based on the location of those sites that are identified as being suitable to meet the unmet housing needs of the Black Country. The commuting, migration and geographic proximity data makes it clear that sites in Bridgnorth, and specifically the Tasley Garden Village site, is best placed to meet those unmet needs. It is clear that sites within Shrewsbury and Ironbridge have a much poorer relationship with the Black Country than Bridgnorth, yet Ironbridge is proposed to provide the same level of contribution as Tasley Garden Village.
- 3.28. As such the Tasley Garden Village site clearly has the strongest functional link with the Black Country authorities owing to its location, commuting and existing migration patterns. As such, it is considered that a greater proportion of these unmet needs could and should be accommodated by the Tasley Garden Village site, included the land identified as Potential Future Direction of Growth, to ensure that these are met whilst still ensuring housing delivery to meet the needs of existing residents in the Bridgnorth Place Plan Area. The level of services available in Bridgnorth, combined with existing and future employment opportunities, also help make it an appropriate, sustainable and attractive location to meet these unmet housing needs.

Appendix 1 – Updated Stage 2a: Housing Sustainability Appraisal Site Assessment

⁷ Our analysis of 2021 Census data.

⁸ As presented at Figure 12.1 of the SA.

⁹ Proportion of total in-migration to Shropshire from Black Country Authorities.

¹⁰ Figure 12.3 of SA.

¹¹ Figure 12.4 of SA.

¹² Proportion of total commuters to Shropshire from Black Country Authorities.

¹³ Proportion of total commuters from Shropshire from Black Country Authorities.

- 3.29. Our previous comments made through our Regulation 19 representations and our Matter 1 hearing statements (Examination doc ref. M1.33) remain relevant with respect to the updated stage 2a Site Assessment and the scoring in respect of the Tasley Garden Village site (BRDO30) with the incorrect scoring for criteria 3 and 5 noting the absence of any Tree Preservation Order on the site or its boundary and the distance to the children’s playground to the north of the A458. This is also of relevance to Appendix 2 which considers the employment site assessment.
- 3.30. Having reviewed the Bridgnorth Settlement Range and the Black Country Contribution Range, it appears that whilst correcting these errors would result in an improvement to the sites scores, it would not alter the sustainability ‘conclusion’ in terms of the range that it falls within.

Appendix 4: Updated Stage 3 Site Assessment – Bridgnorth Principal Centre

- 3.31. It is noted that the Stage 3 Site Assessment for the Tasley Garden Village (BRDO30) site has been partly updated to take into account changes since the original SA was prepared. In respect of the reasoning sub-section, this confirms that the previous planning application for poultry units on part of the draft allocation site was refused and ultimately dismissed at appeal. This is correct however the remaining commentary on this matter within the reasoning sub-section and within earlier sections of the assessment have not been updated to reflect this factual change. This is relevant as there is clearly a requirement to amend the draft Policy S3 to reflect this.
- 3.32. In terms of the commentary on the ability to meet the unmet need, the Stage 3 Site Assessment clearly summarises the relationship of the site and its potential to accommodate towards the unmet housing needs of the Black Country.

4. GC45 – Housing and Employment Topic Paper.

- 4.1. The following sets out our comments on the above document. For ease of reference, comment is provided on individual sections and in the same order that they appear in the Topic Paper.

7. The Housing Requirement.

Identifying the Proposed Housing Requirement

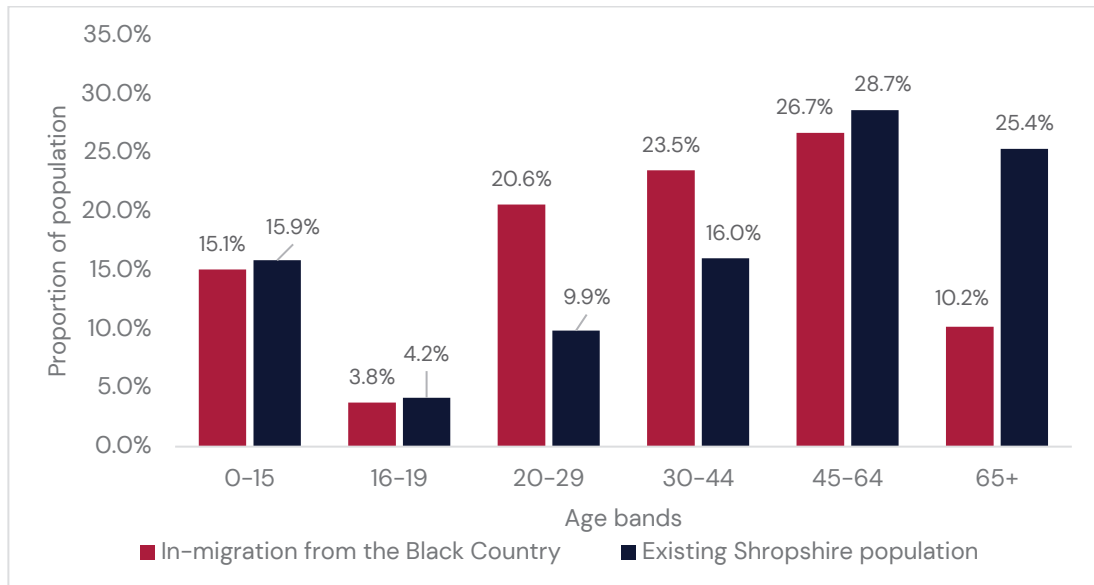
- 4.2. This subsection of the Topic Paper provides extensive commentary on the planning judgement exercise carried out by the local planning authority in determining the housing requirement.
- 4.3. Paras 7.35 – 7.36 appropriately considers the relationship between identified issues and opportunities in Shropshire and the meeting some of the Black Country’s unmet housing needs. Of particular note is reference to the ability to help attract new families to Shropshire¹⁴ and working-age people¹⁵ through the provision of some of the unmet need which will help to retain a more balanced population and respond to the current aging population profile in Shropshire. Whilst the Employment topic area discusses this matter in a little more detail¹⁶, there does not appear to be any data supporting this judgement within the Topic Paper itself.
- 4.4. Given this, and in order to assist the Council and Examination process we have reviewed most recent migration data contained in the 2021 census and specifically concentrated on the age profile of those migrating from the Black Country authorities. The 2021 Census data highlights that the those migrating to Shropshire from the Black Country authorities are generally significantly younger and more likely to be of a working age than the current population of Shropshire.
- 4.5. This Census data is summarised in Figure 1 highlighting that, of those migrating from the Black Country, almost 75% were of working age (16-64) compared to just 59% of the existing population in Shropshire. Of particular note is the proportion of those most likely to start or have a young family with around 45% of in-migrants being aged between 20 and 44, compared with just 26% of the existing Shropshire population. This most recent Census data clearly supports the conclusions reached in Para 7.35.

¹⁴ Para 7.35 c.

¹⁵ Para 7.35 d & e.

¹⁶ Paras 14.21-14.28.

Figure 1 – Census 2021 – In-migration age bands from Black Country authorities.



- 4.6. Although the evidence of in-migration supports the link made between meeting some of the Black Country’s unmet housing needs and other aims and objectives of the Council, this will only be achieved if the type and mix of housing to be delivered meets the needs of those families and working-age people that the Plan seeks to attract. This will be particularly important for those sites that are to accommodate some of the unmet needs of the Black Country in order to attract those younger families and working age population. In particular, it will be imperative that such sites ensure sufficient provision of family homes of an appropriate scale to attract those of working age and younger families.
- 4.7. At present, the housing mix identified in draft Policy DP1 does not take account of this and there should be an amendment to the policy to reflect this. We comment further on this in relation to the implications the proposed sites identified to accommodate the unmet needs (Para. 9.12 onwards of the Housing Topic Paper).
- 4.8. Paras. 7.37 – 7.47 provide useful context regarding the potential deliverability of the proposed housing requirement having regard to completion levels since 2006/07. The data and supporting text do not make it clear that this data is presented as net completions, allowing for demolitions, however having reviewed past Authority Monitoring Report data it is understood that the ‘annual housing completions’ presented are net figures. It would be useful for this to be clarified within the text or footnotes.
- 4.9. The completions data highlights the ability for Shropshire to deliver consistently in excess of the proposed housing requirement which, at the very least, justifies why the housing requirement must be treated as a minimum figure. Whilst the text refers to completion rates since 2016/17 as part of a peak, this actually demonstrates what the housing market in Shropshire can achieve when supported by a plan led planning system with allocations.
- 4.10. It is no surprise the completions data highlights significant and consistently higher levels of housing completions following the adoption of the SAMDev plan in December 2015. The SAMDev plan allocated sites in order to meet the housing requirement identified in the Shropshire Core Strategy. Prior to that, development was largely reliant upon windfall sites to deliver new homes in the absence of an allocation plan and a lack of a 5-year housing

land supply consistently over a number of years. Clearly the continued supply of plan-led housing sites identified through the emerging Local Plan will continue to support these higher delivery rates and clearly demonstrating that the minimum housing requirement is clearly deliverable.

The Proposed Housing Requirement and Reasons for the Proposed Housing Requirement

- 4.11. We support the identification of Option 3b as the appropriate housing requirement for the Shropshire Local Plan set out in Paras 7.56 and 7.57 and the reasons for this as set out in Para. 7.59.
- 4.12. Despite this, given delays in the examination of the Plan it is clear that the Local Plan will now fail to plan for a minimum 15-year period from its adoption as required by NPPF para. 22. Assuming a best-case scenario of adoption by spring 2025 would give the plan 13 years from adoption. Given this, it is necessary for the plan period be extended to 2040 with an additional 2 years of housing supply added to the proposed Housing Requirement. Given the work already undertaken in considering the capacity to accommodate the unmet housing needs, it appears that work to ensure sufficient that there is sufficient land to meet the additional 2-years of supply could be done alongside the examination process and would not unduly delay the adoption of the plan.

Implications of the Proposed Housing Requirement

- 4.13. We agree that there is a requirement to update draft Policy SP2 and its supporting text plus the explanatory text to draft Policy SP7 to reflect the updated housing requirement.

8. Accommodating the Proposed Uplift to the Housing Requirement

Options to Accommodate the Proposed Uplift to the Housing Requirement

- 4.14. It is considered that the four options to accommodating the uplift to the housing requirement are appropriate.
- 4.15. Although it is noted that Option 1 is the preferred approach given the level of windfall completions that have occurred within specific settlements since the start of the plan period, it is important to highlight that in considering Option 2 (densification of allocations) and Option 3 (extension of allocations), the delivery rates identified for our client's land interests at Tasley Garden Village Bridgnorth (BRD030) are considered overly cautious in Table 8.3. On the basis of the updated land control position and proposed amendments to the allocation area, it is considered that even cautious delivery rates for the site are set out in Table 5.

Table 5 – Expected completion rates at Tasley Garden Village (BRD030)

	Tasley Garden Village BRD030
Number of dwellings ¹⁷	1,050
Total Years 1-5	225
Total Years 6-10	500
2033/34	100
2034/35	170 ¹⁸
3035/36	55
2036/37	-
2037/38	-

- 4.16. These are considered cautious estimates as it is considered entirely feasible that the Tasley Garden Village site could support a third outlet, given its scale and the pent-up demand for new housing in Bridgnorth. Bloor Homes are due to launch a new higher specification brand for use on its larger schemes to boost delivery rates and the site at Bridgnorth lends itself well to this product. This could boost annual delivery rates on the site to around 125dpa.
- 4.17. Nevertheless, as set out in Table 5, it is expected that the development at Tasley Garden Village will deliver the number of allocated dwellings earlier and before the end of the plan period, with final completions in the 2035/36. This is of relevance to the consideration of Options 2 and 3 highlighting that the site could deliver at least 270 additional dwellings over the plan period, whether that be through an extension to the site allocation, using part of or all of the Potential Future Direction of Growth area. When considering the options it is important to recognise this potential additional capacity over the plan period.
- 4.18. In terms of the consideration of Option 1, data has been presented regarding windfall completions with Table 8.6 providing details of completions over the last 5 and 10 years (dating back to 2013/14). It would be of use for a list or database of these sites to be provided in order to provide a more robust and transparent evidence base.
- 4.19. Notwithstanding this, in considering these high levels of windfall completions regard must be had to the planning policy context at the time. Whilst the Topic Paper at Paras 8.29 and 8.30 refers to size of the rural county, and recycling of land, as being part of the reason behind windfall development being high, this does not acknowledge the number of sites approved, or allowed at appeal, outside of settlement boundaries due to the Council being unable to demonstrate a five-year housing land supply for several years, particularly prior to the adoption of the SAMDev plan.
- 4.20. Although the data is not provided, just using Shifnal as an example; Table 8.6 identifies 725 completions on windfall sites since 2013/14. Looking at the land uses and scale of Shifnal, it is clear that opportunities for recycling of land or relying on conversions of non-residential buildings are unlikely to provide anywhere near the scale of windfall completions recorded. From a quick review, we have identified at least two sites that were granted permission

¹⁷ As per draft allocation

¹⁸ Figure assumes specialist housing delivered in this year.

outside of the settlement boundary partially as a result of a lack of housing land supply with capacity for around 650 homes. These are:

- Land north of Houghton Road (12/04646/OUT) – up to 400 dwellings.
- Land north east of Stone Drive (14/00062/OUT) – up to 250 dwellings.

4.21. Both these sites would be recorded as windfall developments in Table 8.6 and the same is no doubt true of other settlements across Shropshire, with sites being considered as windfall sites that were granted permission due to land supply positions or prior to their formal allocation through the SAMDev plan.

4.22. This is of relevance to the future supply delivered through windfall sites as those sites delivered outside of settlement boundaries and justified due to the lack of a 5-year housing land supply are an untypical form of windfall supply that was principally as a result of specific circumstances in Shropshire at that time. Assuming that the Local Plan is adopted, it appears unlikely that housing land supply positions would provide justification for a similar wave of larger scale 'windfall' developments over the remainder of the plan period.

9. Accommodating the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

4.23. The commentary and justification for the proposed approach to accommodating the unmet Black Country housing needs within Section 9 of the Topic Paper is largely a summary of that information contained within the Sustainability Appraisal. Given that we have already commented on that document and these matters, we do not repeat our comments here.

4.24. However, in summary and as set out in Paragraphs 3.23–3.30 of these representations, the Tasley Garden Village (BRDO30) site clearly has the strongest functional link with the Black Country authorities owing to its location, commuting and existing migration patterns. As such, it is considered that a greater proportion of these unmet needs could and should be accommodated by the Tasley Garden Village site, included the land identified as Potential Future Direction of Growth, to ensure that these are met whilst still ensuring housing delivery to meet the needs of existing residents in the Bridgnorth Place Plan Area. The level of services available in Bridgnorth, combined with existing and future employment opportunities, also help make it an appropriate, sustainable and attractive location to meet these unmet housing needs.

4.25. Rather than repeat these comments, the following does provide comment on the implications of this approach on the draft Plan.

Implications of the Proposed Sites Identified to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

4.26. We agree that main modifications are required to reflect the proposed change to draft Policy SP2 and its supporting text, as well as those draft policies relating to those sites/Place Plan Areas which are to accommodate some of the unmet housing needs from the Black Country. As the proposed modifications have not been published for consultation, we reserve the right, and will no doubt have the opportunity to, comment on these when they are available.

- 4.27. Whilst no detail has been provided on what these modifications comprise of, it is important that they deal with the matter of housing mix and recognise that accordance with draft Policy DP1 and the requirement for housing mix based solely on the Shropshire Strategic Housing Market Assessment (SHMA) is unlikely to appropriately respond to the unmet needs of the Black Country authorities.
- 4.28. As we have already highlighted, in-migration from the Black Country authorities into Shropshire is generally comprised of a greater proportion of working age people and those either likely to have, or look to start families, when compared with the current age profile of Shropshire. As such, it is clear that providing a housing mix based solely on the Shropshire SHMA data, or any subsequent updates, is unlikely to meet the unmet needs in an appropriate manner and, importantly, would fail to secure the benefits and opportunities associated with accommodating some of this unmet need that is discussed in detailed earlier within the Housing Topic Paper at paras 7.35–7.36. Clearly a failure to provide an appropriate mix of housing, including no doubt more family sized homes, will not attract the labour force and younger population envisaged in the Topic Paper.
- 4.29. It is therefore recommended that amendments are made to either the site-specific policies to recognise the need to provide an alternative mix of homes to meet the unmet need, or amendments are made to draft Policy DP1.

16. Accommodating the Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country

- 4.30. We do not seek to comment in any detail on the approach and conclusions reached in respect of where the unmet employment land needs of the Black Country should be accommodated. However, we endorse and agree with the conclusions from Para 16.81 that the Tasley Garden Village site does not represent an appropriate location to accommodate these employment needs. We support the reasoning for this noting that connectivity by road and rail, and in particular motorway access, are likely to be key determining factors for those businesses looking for space within Black Country but having to relocate to Shropshire to accommodate their needs owing to a lack of supply. Whilst Bridgnorth is well related to the Black Country, it does not benefit from direct motorway access or rail access that businesses forced to relocate may consider important.

5. GC25 – Draft DP Policy: Housing Provision for Older People and those with Disabilities and Special Needs.

- 5.1. In commenting on this draft Policy, it is first important to highlight that the policy, at 20 parts, split across 3 ½ pages and at around 1,500 words lacks the precision or clear unambiguous guidance needed to assist future decision making. It appears that parts of the policy are unnecessary, or at the least unnecessary lengthy and it should be amended accordingly.
- 5.2. Regardless of this, we have significant concerns regarding part 15 of the draft policy which requires site of 250 or more dwellings to provide 20% of homes to be provided as specialist housing. Whilst the explanatory text provides some form of justification for the approach at paragraph 68, suggesting that these sites benefit from significant economies of scale, the Local Plan Delivery & Viability Study (EV115) does not consider this new policy requirement in its assessment.
- 5.3. As such, there is no evidence that such a policy approach would not affect the viability of such sites, particularly when noting that such sites typically have higher infrastructure costs/requirements than smaller sites. In addition, there could be circumstances where there is insufficient demand for such properties, or that demand/take-up of these properties is very slow. This is likely to harm overall viability and delivery rates on these larger sites.
- 5.4. In addition to this, this approach will significantly reduce the number of market homes delivered on these larger sites. This is particularly relevant to the Tasley Garden Village site which is proposed to be included as one of the sites to meet some of the unmet housing needs of the Black Country authorities. Noting that the majority of in-migration from the Black Country is younger than the Shropshire average and therefore less likely to be in need of specialist housing, the impact of this new policy requirement would significantly reduce the amount of traditional (i.e. non-specialist) market and affordable housing that the site could deliver for Shropshire residents.
- 5.5. Whilst this is a largely mathematical exercise noting that any housing actually delivered would not have restrictions on occupation, allowing for the 210 specialist homes to be delivered¹⁹, plus the 600-home contribution towards meeting Black Country unmet needs would leave the delivery of just 240 typical market/affordable homes for existing local residents.
- 5.6. Notwithstanding this, and the lack of evidence in relation to viability, there has been no evidence produced regarding how such specialist homes have been delivered within Shropshire to date. Windfall sites are typically seen as a key delivery mechanism for specialist housing developments across the country and this is particularly the case for assisted living and care home schemes. These schemes regularly come forward as windfall sites as operators seek sites adjacent to or within town/district centres to ensure residents benefit from easy access to existing facilities. As a result delivery is often on unallocated

¹⁹ 20% of the 1,050 dwellings allowed for in the draft allocation.

sites through recycling vacant or under-used brownfield sites in urban areas. However, there appears to be no evidence presented as to the likelihood of such sites accommodating some, or all of the specialist housing need in Shropshire.

- 5.7. Whilst strategic sites could provide opportunities for such specialist housing developments, the current 20% requirement is not considered to be justified and could easily lead to overprovision of such specialist housing on those larger sites.
- 5.8. Linked to this matter, it is noted that part 3 of the draft policy requires at least 5% of dwellings to be built to the M4(3) standard on sites of 5 or more dwellings. Setting aside our concerns with Part 15 of the policy, which already requires a higher proportion of such properties to be delivered on sites over 250 dwelling (20%), we also have concerns regarding this blanket requirement to deliver 5% M4(3) standard homes.
- 5.9. To deliver such homes would require either an identified end user, or a restriction placed upon who can purchase those properties built to M4(3) standards. Developers are unable to build a M4(3) property and leave it empty until such a time that a purchaser comes along with that specific need. An alternative and more appropriate approach would be to require a financial contribution, through a Section 106 agreement, to be paid to Shropshire Council to allow them to use the funds to provide grants for those that are eligible to allow for the conversion of M4(2) homes into an M4(3) home. This would ensure that amendments made to the property can be tailored to meet specific needs of that individual whilst also allowing the opportunity for the funding to be used for such conversions across Shropshire, and not merely site specific, this will be particularly helpful for those wishing to adapt their existing home.
- 5.10. We are also concerned by the proposed wording and approach of part 19 of the draft policy. It is unclear precisely what the intention of this part of the policy is however, at the very least, it appears that an unintended consequence of the draft wording is to potentially restrict delivery on sites that are to be allocated in the emerging plan. Given that these comments relate to the precise wording of this part of the policy for ease of reference the current draft wording is as follows:

'On site allocations, provision of a level of housing which results in the relevant settlements housing guideline being exceeded and/or the site allocations approximate site provision figure within the relevant Settlement Policy (S1-S20) being exceeded will be positively considered where:

a. This over-provision is a direct result of the provision of a significant quantity of specialist housing in excess of that required within Paragraphs 15-17 of this Policy, b. Over provision is specialist housing of a type documented within Paragraph 8 of this Policy,

c. The development proposed remains an appropriate form of development on the site having regard to its characteristics and the character of the surrounding area, and

d. The proposed development complies with the wider policies of the Local Plan, particularly Policies SP3, SP5, SP6, DP1, DP2, DP3, DP11, DP12, DP14-DP17, DP25, DP27, and DP28.'

- 5.11. The potential to restrict delivery on allocated sites in the emerging plan is principally down to the wording of the policy which seeks to put in place considerations for sites that are **allocated** but would result **either** in the site allocation development guidelines being

exceeded, or the overall settlement housing guideline being exceeded as a result of development on the site. Whilst it is noted that the wording of the policy suggests that such instances will be 'positively considered' where various criteria are met, the wording could suggest that where this occurs and the criterion are not met, the proposals will not be considered positively by the decision maker and therefore contrary to this policy.

- 5.12. Setting aside the lack of clarity on this, the impact of this could be to prevent the delivery of housing on an allocated site where the settlement housing guideline has been exceeded. The settlement housing guideline could have been exceeded as a result of windfall development or the 'over-delivery' on another allocated site. Hampering delivery of housing on allocated sites clearly cannot be justified or effective. The issues with this policy approach are amplified when it is noted that such considerations would not be applied for non-allocated sites given the wording of the first part of Part 19 of the policy which confirms this relates 'on site allocations' only. For example, a windfall site providing 250 homes, in a settlement where the housing guidelines have been exceeded would not be subject to the same tests/considerations as a site allocated in the plan for the same number of homes.
- 5.13. Finally, it is unclear as to why there is a requirement for such a policy approach within this draft policy that could be used to restrict housing growth within settlement areas. As is highlighted in the proposed modifications to policy SP2, the overall housing requirement must be treated as a **minimum figure**. Arbitrarily seeking to restrict the number of homes delivered on allocated sites to a specific figure or settlement guideline will fail to plan positively for housing delivery throughout the plan period.
- 5.14. Given the issues with this part of the policy, this should be deleted or substantially reworded to ensure that delivery on site allocations is not unduly restricted.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Manchester

Queens House, Queen Street,
Manchester, M2 5HT
T 0161 3933399
E Manchester@pegasusgroup.co.uk
Offices throughout the UK.

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: 33 Sheep Street, Cirencester, GL7 1RQ
We are ISO certified 9001, 14001, 45001



Pegasus_Group



pegasusgroup



Pegasus_Group

PEGASUSGROUP.CO.UK