

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:	PATRICK T HOWELL
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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 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):

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.

[BRD030 Tasley Garden Village, Bridgnorth](#)
 'Bridgnorth is located in south-east Shropshire with a functional relationship to the Black Country. It benefits from strong road links to the Black Country via the A454 corridor.'

This statement is repeated in a similar form throughout the Sustainability assessment e.g.

'Bridgnorth has strong highway transport links to the Black Country (approximately 14 miles away) via the A458 corridor'

This statement is incorrect – in fact the transport connectivity to the Black Country from Bridgnorth is poor. The main route into the Black Country, the A454 (Wolverhampton Rd) is single carriageway and already suffers from congestion at peak times. It also passes through several miles of residential Wolverhampton before joining the ring road. Access at the Bridgnorth end is either via the steep Hermitage Hill, or via two roundabouts linked by the road past Stanmore industrial estate.

(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.



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d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

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

Paragraph(s):	Appendix 4 -Updated Stage 3 Site Assessment: Bridgnorth Principal Centre BRD030 p557 et seq.
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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 proposed site is a very large greenfield housing/industrial development. This will have significant impact on the environment, and the quality of life of the existing local population. The housing is well beyond reasonable walking distance to Bridgnorth town centre. It is suggested that a footbridge be provided, but it's unlikely anyone will walk into Bridgnorth to shop and then walk back again, particularly if they are elderly or have mobility problems.

This will lead to increased traffic down the Ludlow Road and Salop Street to access the Smithfield area (Supermarket/car park/Health Centre) which is already a very busy and often congested route, with the roundabout at the top of Squirrel Bank a particular choke point. There will be an increase in noise, traffic delays and pollution, negatively impacting the residents.

The scale of the development (>1,000 dwellings) is such that there could potentially be 1,000-2,000 more cars using Bridgnorth roads, and also the busy commuter routes out of town towards the Black Country and Telford

This has not been sufficiently taken into account when planning for an increase in the size of Bridgnorth beyond its natural growth rate.

(Please continue on a separate sheet if necessary)

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10 June 2024 v1.0 4 pages.

Name: **Patrick Thomas HOWELL**

Email:

Address

Two responses, relating to the Housing and Employment Topic Paper, and the Additional Sustainability Appraisal Report.

Summary of Responses

- (1) Bridgnorth is unsuitable as a location for housing to meet Black Country housing needs. The Black Country is not sustainably commutable from Bridgnorth due to significant transport constraints and there doesn't seem to be any evidence that incoming migrants currently employed in the Black Country area will switch to local employment. Housing to meet Black Country needs should be located near the main transport links – the M54 and the rail network

- (2) The scale and location of the proposed development at Tasley (BRD030) will cause serious local issues due to increased traffic, with an impact on quality of life, air quality, and local journey times

(1) Housing and Employment Topic Paper April 2024

Table 9.1 (p74)

BRD030 Tasley Garden Village, Bridgnorth

'Bridgnorth is located in south-east Shropshire with a functional relationship to the Black Country. It benefits from strong road links to the Black Country via the A454 corridor.'

This statement is repeated in a similar form throughout the Sustainability assessment e.g.

'Bridgnorth has strong highway transport links to the Black Country (approximately 14 miles away) via the A458 corridor'

This statement is incorrect – in fact the transport connectivity to the Black Country from Bridgnorth is poor. The main route into the Black Country, the A454 (Wolverhampton Rd) is single carriageway and already suffers from congestion at peak times. It also passes through several miles of residential Wolverhampton before joining the ring road. Access at the Bridgnorth end is either via the steep Hermitage Hill, or via two roundabouts linked by the road past Stanmore industrial estate.

As noted elsewhere, there is no rail link or motorway link into the Black Country, unlike the settlements along the M54 corridor. Public transport is also very limited. There is no viable way to mitigate the connectivity issues.

- It is proposed that 600 dwellings be provided to contribute towards the unmet housing needs forecast to arise within the Black Country
- It's unlikely that a significant number of people moving to the site will decide to abandon their careers and seek employment in Bridgnorth, even if businesses move to the proposed employment land allocations
- This will result in a significant increase in commuter traffic to the Black Country from Bridgnorth.
- The round trip to Wolverhampton is c 30 miles, so it's likely that the average commute of people moving to Bridgnorth will increase compared with their existing commute

This will have a negative impact of the following Sustainability Objectives

5: Encourage the use of sustainable means of transport

6: Reduce the need of people to travel by car

The limited access to the Black Country from this and other Bridgnorth sites is acknowledged in the Housing and Employment Topic Paper April 2024 – in the Employment Land section.

(my emphasis in **bold**)

16.90. Whilst the site also includes employment provision, given the **constraints to connectivity to the motorway and main line railway network**, it is considered that this site **does not constitute an appropriate location** to accommodate any of the proposed 30ha contribution to the unmet employment land needs forecast to arise in the Black Country.

...

16.92. ... to be an attractive alternative to meeting the need in its original location, it must be within a location that meets geographic needs **and is in a location considered commutable, preferably by sustainable means**. As such, connectivity, ideally by sustainable forms of transport, to the Black Country is a key factor when determining if a contribution is appropriately located.

16.93. This is an important distinction to accommodating a contribution to unmet housing needs, where **occupiers migrate to this provision and associated employment opportunities are also provided** (as is the case in the context of the proposed Shropshire contribution to the unmet housing need forecast to arise in the Black Country).

Taken together, this implies that;

- (a) BRD030 and other Bridgnorth sites are not commutable by sustainable means
- (b) It is expected that people moving to the area from the Black Country will take up the employment opportunities provided locally

In the case of (a) this contradicts multiple statements throughout the documents; e.g. 'Bridgnorth ..benefits from strong road links to the Black Country via the A454 corridor' which are used to support the allocation of housing in Bridgnorth to meet Black Country unmet housing needs

In the case of (b) is there any evidence that the majority of people (not already employed in Bridgnorth) will leave their employment in the Black Country and find local employment ? Bridgnorth has a sizeable community from the Black Country, and also a large number of people commuting there every day, so there must be data available showing what proportion of incoming migrants have switched to local employment after, for example, 1 year.

(2) Additional Sustainability Appraisal Report April 2024

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

BRD030 p557 et seq.

The proposed site is a very large greenfield housing/industrial development. This will have significant impact on the environment, and the quality of life of the existing local population.

The housing is well beyond reasonable walking distance to Bridgnorth town centre.

It is suggested that a footbridge be provided, but it's unlikely anyone will walk into Bridgnorth to shop and then walk back again, particularly if they are elderly or have mobility problems.

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This has not been sufficiently taken into account when planning for an increase in the size of Bridgnorth beyond its natural growth rate.

I do not consider it necessary to attend a hearing session(s) to discuss these comments

Regards

Patrick T Howell