

## 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:	Stanmore Consortium
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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 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 type="checkbox"/>
<b>d. Updated Green Belt Topic Paper.</b>	<input type="checkbox"/>

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

Paragraph(s):	Please see attached document: Stanmore Consortium-Sustainability Appraisal Reps June 2024
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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.**

Please see attached document: Stanmore Consortium-Sustainability Appraisal Reps June 2024
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*(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.*

Shropshire Local Plan

Additional Sustainability Appraisal Report

June 2024

Document Identification	Detailed Comments
<ul style="list-style-type: none"> <li>• Additional SA – IRN001</li> <li>• Pages 268/270</li> <li>• Appendix 1- pages 31</li> <li>• Appendix 10- pages 21-24</li> <li>• These representations consider that there are issues of unsoundness</li> </ul>	<p>Chapter 12 of the Sustainability Appraisal summarises the updated assessment work undertaken to inform the identification of sites to accommodate the proposed 1500 dwellings and 30ha employment land contribution towards the unmet needs forecast within the Black Country. It seeks to promote the functionality of the preferred sites to meet the unmet need, in relation to their connectivity to the Black Country. In relation to Ironbridge, in the summary section of the <b>IRN001 site</b> (pg. 268), the Council sets out that <i>'it benefits from road access to the M54/A5 corridor link to the Black Country via either the A4169/A5523 or A4169/A442, however it later goes on to state (Appendix 2, pg. 22) that 'the site is some distance from these corridors'</i>. This clearly highlights that there are issues with the connectivity of the Ironbridge Site and in particular its ability to meet the needs of the Black Country in terms of connectivity. The Council also note that <i>'the nearest railway links providing direct links to the Black Country is at Telford and Wellington and would likely require some other form of transport to access them'</i>. This issue has not been taken into consideration through the SA scoring system.</p> <p>The SA in considering the contribution to the Black Country does not explicitly consider commuting times and distance. There is no evidence that this has been factored into the overall scoring of the contribution to the Black Country. A sound approach would be to include an additional criterion specifically related to commuting time to Black Country. For example, a criterion should be included with a specific commute time from the nearest major settlement in the Black Country. This should also consider the accessibility of the site in terms of Public transport, private vehicle, bicycle and walking.</p> <p>The use of such a criterion could have then been scored appropriately to filter down which sites would be accessible and suitable to meet the needs of the Black Country.</p> <p>The SA also sets out that site IRN001 will accommodate roughly 1,075 dwellings, 600 of which will contribute to the unmet needs of the Black Country. The site benefits from a mixed-use Outline Planning Permission (19/05560/OUT) which includes the provision of 1,000 new homes. In the updated SA, the Council set out the reasoning for recommending the site as suitable to meet unmet housing need forecast to arise within the Black Country, part of which refers to the outline permission on the site:</p> <p><i>'The mixed-use redevelopment of the Former Ironbridge Power Station site presents an opportunity to support the local economy, create jobs, provide housing needs arising in Shropshire and accommodate 600 houses as part of the proposed contribution to the unmet housing need forecast to arise within the Black Country.'</i></p>

The planning application was submitted and approved under the assumption that the development would meet housing and employment needs of Shropshire, rather than the unmet needs of the Black Country. The Planning Statement supporting the Planning Application makes reference to the Reg 18 Local Plan, which is used to justify the principle of development, it states:

*'appropriate redevelopment of the site will contribute towards achieving the aspirations of the Economic Growth Strategy. Importantly, it will also contribute towards meeting housing and employment needs in Shropshire and allow the effective re-use of the brownfield elements of the site'*

This reasoning for the redevelopment of the Ironbridge site has also been used by the Council in the Reg-19 submission of the draft Local Plan.

Whilst the Council has identified that 600 units of the approved dwellings on the site will be used to meet the needs of the Black Country, it is relevant to note that in the Council's consideration of the Ironbridge planning application, the locality and sustainability of the site in relation to the Black County was not considered.

Finally, The SA states in its Strategic Considerations (Appendix 10, pg. 23) of site IRN001, that:

*'The site performs poorly for residential and employment both within the context of a potential strategic site/settlement and the Black Country Contribution, within stage 2a of the Sustainability Appraisal'.*

The SA gives the IRN001 site an overall score of **-19** and a rating of **'Poor'** for both the overall settlement and the overall Black County contribution. The SA sets out that sites which perform 'poorly' are considered to have likely significant adverse effects for which mitigation measures should be proposed. When compared to other strategic sites, for example BRD032, which is given an overall score as of -5 and rated as 'good' for the overall settlement contribution and as 'fair' for the overall Black County Contribution, it raises the question as to how a site that has been rated significantly more negative overall has been considered as the preferred option for meeting the Black Country's housing need.

The SA on Page 271 para 12.98 states "that the mitigation measures for IRN001 are also considered equally effective in the context of sustainably accommodating the identified component of the proposed contribution to the unmet housing need forecast to arise within the Black Country". There is no evidence whatsoever provided in the SA for this statement, and therefore the scoring set out in the SA of "-19" is considered to be robust.

	<p>Using the reasoning for recommendation that there is already approved outline permission on the site that can provide 600 houses to meet the unmet need in Black Country is contradictory to the scoring conclusions given to the site in the SA and therefore unsound.</p> <p>From the reasons set out above, it is considered that the site ref: IRN001 (Former Ironbridge Power Station) is not capable of meeting the housing needs of the Black Country.</p>
<ul style="list-style-type: none"> <li>• Additional SA – SHR060 &amp; SHR158 &amp; SHR161</li> <li>• Page 268</li> <li>• Appendix 9 pages 62/134/142</li> <li>• Para 12.17 page 235</li> <li>• These representations consider that there are issues of unsoundness</li> </ul>	<p>Site references SHR060 &amp; SHR158 &amp; SHR161 which include land between Mytton Oak Road and Hanwood Road, Shrewsbury, have been identified by the Council as an appropriate location for 300 dwellings to contribute to the unmet needs of the Black Country. The Council has stated that ‘Shrewsbury’, not the site itself, ‘has a functional relationship to the Black Country’ (page 268). In the Stage 3 updated Site Assessment ‘Relationship to the Black Country’ (Appendix 9 pages 62/134/142) the Council set out that:</p> <p><i>‘The site is located to the west of Shrewsbury. Shrewsbury is located in the centre of Shropshire, with a functional relationship to the Black Country. Shrewsbury benefits from being located on the A5/M54 corridor which provides links to the Black Country (which is some 22 miles away). Shrewsbury also benefits from a railway station which offers regular train services to the Black Country via the Shrewsbury to Wolverhampton Line.’</i></p> <p>Again, the focus is on the location of Shrewsbury as a whole, rather than the specific location of the site itself. From a desktop search, if travelling from the central part of the site to Wolverhampton (the closest part of the Black Country to Shrewsbury) via public transport ( bus and train), it would take approximately 1hr20 minutes. Further, if traveling to the station by car, parking for the train station is extremely limited and the station is in the town centre which can become congested at peak times. If travelling by car to the Black Country, it would take approximately 50 minutes <u>without</u> factoring in peak hour commuter traffic. This raises the question of how sustainably located this area to the west of Shrewsbury is in terms of proximity to the Black Country.</p> <p>It is unclear in the SA how commuting times and distance has been factored into the overall scoring of the contribution to the Black Country, if in fact it is factored in at all. A sound approach would be to include an additional criterion specifically related to commuting time to Black Country. For example, a criterion should be included with a specific commute time from the nearest major settlement in the Black Country. This should also consider the accessibility of the site in terms of Public transport, private vehicle, bicycle and walking.</p> <p>The SA also sets out on page 235 under the ‘Summary: Process Undertaken to Identify a Reasonable Assessment Geography’ heading that:</p>

	<p><i>'it is considered that eastern and central parts of Shropshire are in geographic proximity, particularly to Wolverhampton and Dudley. However, northern, southern and western portions of Shropshire have a much more limited geographic proximity to the Black Country'.</i></p> <p>Although it can be agreed that Shrewsbury Town Centre lies fairly central with the Shropshire authority geographic area; sites SHR060 &amp; SHR158 &amp; SHR161 sit on the western outskirts of Shrewsbury Centre, making the sites connectivity to the Black County considerably less accessible than those who live either closer to the centre of Shrewsbury/to Shrewsbury Train Station and on the eastern fringe. The argument that sites that fall within the Shrewsbury area are in geographic proximity the Black Country is weak and unsound; particularly as the most northern point of the Shrewsbury defined area expands to Wem and out to the very western borders of the Shropshire authority. Therefore applying a blanket approach for all sites in in Shrewsbury in terms of proximity to the Black County is inaccurate, misleading and unsound.</p> <p>The overall score in the SA for the site references SHR060 &amp; SHR158 &amp; SHR161 is -5 and rated as 'fair' for the overall settlement contribution and as 'fair' for the overall Black County Contribution, however if commuting distances and travel times for the western fringes were factored into the scoring system, it is likely that these results would be considerably lower.</p> <p>The shortcomings in the blanket approach is clearly shown when looking at the Bridgnorth sites, such as BRD032. The SA gives BRD030 an overall score of -5 and is rated as 'good' for the overall settlement contribution and given a rating of 'fair' for the overall Black County Contribution; this location is clearly situated in a more sustainable location in relation to the Black Country, and therefore has more potential to satisfy the unmet housing need. This example demonstrates that the geographical location has not been factored into the assessment.</p> <p>From the reasons set out above, it is considered that the sites referenced SHR060 &amp; SHR158 &amp; SHR161 have not been properly assessed in the Additional SA and are clearly not capable of meeting the housing needs of the Black Country.</p>
<ul style="list-style-type: none"> <li>• SHF18b &amp; SHF18d</li> <li>• Appendix 2-pg. 8</li> </ul>	<p>Site references SHF18b &amp; SHF18d in Shifnal have been identified as appropriate locations to accommodate the 30ha of employment land needed satisfy the unmet needs of the Black Country. As identified in the updated Green Belt Topic Paper, the sites have been recommended for removal out of the Green Belt to allow for the development.</p>

<ul style="list-style-type: none"> <li>• These representations consider that there are issues of unsoundness</li> </ul>	<p>The overall score for the site in the Additional Sustainability Appraisal is “-10” and rated as ‘fair’ for the overall conclusion for both the settlement sustainability and the Black Country sustainability. However, in Bridgnorth, site ref BRD032 has been given an overall score of “-5” and a rating of ‘good’ for the overall settlement sustainability conclusion, but surprisingly a rating of only ‘fair’ for the overall Black Country Sustainability. Sites SHF18b &amp; SHF18d and BRD032 have a rating of ‘fair’ but score significantly different in terms of positively or negatively meeting the sustainability criteria.</p> <p>If the sites were being scored side by side with a baseline of zero then SHF18b &amp; SHF18d would score more negatively than BRD032, making it a less favourable site for development. Therefore, we consider there to be a discrepancy in the overall conclusions of the definition of ‘good’, ‘fair’ and ‘poor’.</p>
<ul style="list-style-type: none"> <li>• BRD032/P56</li> <li>• Appendix 2 of the Additional SA “Updated Stage 2a: Employment Sustainability Appraisal Site Assessment )</li> <li>• Appendix 1 Pages 5&amp; 31; Appendix 2 Pages 3 &amp; 24)</li> <li>• These representations consider that there are issues of unsoundness</li> </ul>	<p>We have concerns relating to the scoring in Appendix 2 of the Additional SA “Updated Stage 2a: Employment Sustainability Appraisal Site Assessment” in relation to sites BRD032 and P56 in Bridgnorth. The scoring in relation the impact on a Scheduled Monument has not been updated since the original SA was prepared. The scoring does not take into consideration the clarification provided by Historic England (HE) on the updated Stanmore Masterplan for BRD032. Historic England provided an updated response (Appendix 5 of the Stanmore Reg 19 Representations ) this sets out the following clarification:</p> <ul style="list-style-type: none"> <li>▪ HE comments on concern about impact due to scale of development, made in January 2019, were based on the information they had at the time which was the land area outlined for the new garden village in the Preferred Sites Consultation. This included a considerably larger site than now promoted and indicated development could take place within the area of the scheduling. Their comments were not based on a masterplan and in fact they were not made aware of more detailed proposals in a masterplan until 17 November 2020;</li> <li>▪ HE has now appraised the latest Masterplan for Stanmore and consider that it demonstrates that harm to the Scheduled Monument can be mitigated through the provision of amenity/play space creating a buffer to The Hermitage and they make recommendations how a higher level of mitigation can be secured;</li> <li>▪ HE confirm the area for development post 2038 as shown on the latest masterplan will not impact on The Hermitage;</li> <li>▪ HE confirm Scheduled Monument Consent was granted for cultivation of the area within the</li> </ul>

	<p>scheduling as the significance of the monument was not likely to be harmed, development would have a very different impact to cultivation;</p> <p>The scoring of “- -” in the updated Additional SA issued in April 2024 still does not take this into account and therefore it is incorrect and unsound and the scoring should be more positive.</p>
<ul style="list-style-type: none"> <li>• Additional SA – BRD030</li> <li>• Page 267</li> <li>• Appendix 4- pages 62</li> <li>• Appendix 1- pages 31</li> <li>• These representations consider that there are issues of unsoundness</li> </ul>	<p>Chapter 12 of the Sustainability Appraisal summarises the updated assessment work undertaken to inform the identification of sites to accommodate the proposed 1500 dwellings and 30ha employment land contribution towards the unmet needs forecast within the Black Country. Site reference BRD030 known as Tasley Garden Village, has been identified by the Council as an appropriate location to accommodate 600 dwellings to contribute to the unmet needs of the Black Country.</p> <p>The SA gives the Tasley Garden Village site (BRD030) an overall score of <b>-10</b> and a rating of <b>‘Fair’</b> for both the overall settlement and the overall Black County contribution. When compared to other strategic sites considered, for example BRD032 (Stanmore), which is given an overall score of -5 and rated as <b>‘good’</b> for the overall settlement contribution and however is given a rating of <b>‘fair’</b> for the overall Black County Contribution; this raises a question of the soundness of an approach where a site that has predominantly negative ratings has been considered as the preferred option for meeting the Black Country’s housing need (Appendix 1-Page 31).</p> <p>Given that Bridgnorth is identified as one of the most sustainable locations in relation to the Black Country, it would be entirely appropriate for Bridgnorth to be the focus for meeting both the Shropshire housing need and also that for the Black Country. Such an approach could include land at Stanmore( BRD032) being brought forward, on the basis that the site could meet a significant proportion of the additional need, in one of the most sustainable locations relating to the Black Country. Such an approach would be far more robust than developing the sites in more remote and unsustainable locations such as on the west of Shrewsbury (SHR060 &amp; SHR158 &amp; SHR161).</p>
<ul style="list-style-type: none"> <li>• BRD030 - Tasley Garden Village, Bridgnorth</li> <li>• Appendix 1 page 31</li> </ul>	<p>BRD030 - Tasley Garden Village, Bridgnorth is a proposed large site located to the south-west of Bridgnorth. The SA states <b>“the site has the potential to deliver a new sustainable urban extension incorporating the credentials of a garden village development.</b> The site could provide a mix of housing which would contribute to meeting local needs, a new employment site in a prime roadside location, community facilities within a new local centre to support the new community and extensive green infrastructure. The site generally has good vehicular access potential. However there will be a need</p>



<ul style="list-style-type: none"> <li>• Appendix 2- Page 24</li> <li>• Appendix 4 Page 63 &amp; 65</li> <li>• These representations consider that there are issues of unsoundness</li> </ul>	<p>to undertake works to road infrastructure to ensure that it is appropriate to support the development.”</p> <p>This description does not reflect the wording in the Policy in the Submission Local Plan in Schedule S3.1 (i) which states</p> <p>“A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a ‘garden village’ identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth’s character. The development of this site will be in accordance with a vision, design code and masterplan which will be prepared in consultation with the public and adopted as a Supplementary Planning Document by Shropshire Council. This will represent a significant material planning consideration and must be completed before any planning application for development of the site.”</p> <p>In this context it is important that the SA specifically considers the ability of sites to deliver a comprehensive mixed use development to comply with the Submission Local Plan policy; and its ability to deliver a development which complies with Garden Village principles, including the requirement to provide high quality housing, employment, new local centre and green infrastructure.</p> <p>Therefore the SA should specifically include a criteria which assesses the sites ability to <b>comply</b> with the principles of a ‘garden village’ identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines,.</p>
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## Part B: Your Response

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Name and Organisation:	Stanmore Consortium
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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 type="checkbox"/>
<b>b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.</b>	<input type="checkbox"/>
<b>c. Updated Housing and Employment Topic Paper.</b>	<input checked="" type="checkbox"/>
<b>d. Updated Green Belt Topic Paper.</b>	<input type="checkbox"/>

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

Paragraph(s):	Please see attached document: Stanmore Consortium-Housing and Employment Topic Paper reps June 2024
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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.**

Please see attached document: Stanmore Consortium-Housing and Employment Topic Paper reps June 2024
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*(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.*

Shropshire Local Plan

Updated Housing and Employment Topic Paper

June 2024

Document Identification	Detailed Comments
<ul style="list-style-type: none"> <li>• Housing and Employment Topic Paper</li> <li>• Chapter 4</li> <li>• Concerns over soundness</li> </ul>	<p>Although initially resisted by the Council, it has now been accepted that Shropshire is required to meet a portion of the unmet housing and employment need arising from the Black Country. Previously representations were made by the Association of Black Country Authorities (ABCA) in support of its work in preparing a joint local plan. Although work on the joint plan is no longer progressing, the figures prepared by ABCA on unmet need for housing and employment land remain valid and equate to a total of 1,500 dwellings and 30Ha of employment land during the plan period. Indeed, the Inspectors confirm this in their letter to the Council on 15<sup>th</sup> August 2023 [para 14 of ID28] <i>‘Despite this new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear’.</i></p> <p>The Inspectors go on to confirm that meeting the unmet need of Black Country authorities should be the starting point within the Shropshire Local Plan although this may be reviewed at an unknown future point once the constituent ABCA Councils have progressed with their individual local plans [para 16 of ID28]. This is clearly acknowledged in the introduction to the updated Housing and Employment Topic Paper 2024 (HETP 2024) [GC45] which forms a major element of the current consultation exercise. The HETP 2024 is prepared on the basis of the findings of the Sustainability Appraisal 2024, which identifies a need to make a contribution of 1,500 dwelling to the unmet Black Country need (Option 2) and that Option 3b ‘High Growth plus a 1,500 dwelling contribution to the unmet housing need forecast to arise in the Black Country’ is the appropriate reasonable option to pursue as a housing requirement in the local plan.</p> <p>As well as the additional need arising from the Black Country, the Council is also proposing an uplift of 500 dwellings within the plan. The Council finds that Option 1 ‘Increasing Settlement Guidelines and Windfall Allowances’ is the most appropriate and sustainable means of addressing the 500 dwelling uplift. The Council therefore finds that <i>‘it is not considered necessary to identify any further site allocations to accommodate this proposed uplift’</i> [paras 2.9 - 2.11 GC45].</p> <p>The HETP 2024 sets out how the increase in housing need of 500 units is addressed at Chapter 8 as well as the accommodation the 1,500 unit unmet need from the Black Country at Chapter 9.</p> <p>Chapter 8 addresses the proposed 500 dwelling uplift across 92 paragraphs and 34 pages of the HETP. This analysis considered a</p>

number of criteria and options for meeting this uplift. The corresponding chapter, addressing the accommodation of 1,500 dwellings extends to 14 paragraphs and six pages.

Chapter 8 sets out that the preferred option for meeting the 500 dwelling uplift is 'Option 1: Increasing Settlement Guidelines and Windfall Allowances'. This is preferred to 'Option 2: Densification of Proposed Site Allocations', 'Option 3: Increasing Site Allocations' and 'Option 4: A Combination of Two or More of the Other Options'.

Chapter 9 explains that the process for identifying sites to accommodate unmet Black Country need first sought to establish an appropriate geography in which the need could be accommodated based on geographic proximity to the Black Country, migration patterns, commuting patterns and the interaction between Shropshire and the Black Country with regards to Travel to Work Areas (TTWAs).

The assessment found that the appropriate geographies to accommodate Black Country unmet need fall within the east and centre of the county within larger existing settlements where housing growth is already proposed in the plan and in strategic settlement sites. The Council then undertook an assessment of all available sites within this geography.

This assessment comprised multiple phases:

- Stage 1 – a high level strategic assessment of all sites in Shropshire
- Stage 2a - a targeted update of sites within the relevant geography
- Stage 2b – sites filtered by size and availability
- Stage 3 – a detailed site assessment process

The above appears to be an appropriate approach to determining which geographies to consider. However, the Council has used this to identify which Place Plan Areas should constitute the scope for this element of work. These Place Plan Areas are Albrighton, Bridgnorth, Broseley, Highley, Much Wenlock, Shifnal and Shrewsbury. Place Plan Areas are used by the Council to break up what is otherwise a large and diverse County.

Paragraph 2.13 of the Draft Shropshire Local Plan [SD002] sets out that

*'Because of the County's size, the Local Plan uses a series of smaller Place Plan Areas, normally consisting of a main Market Town and its surrounding hinterland. These Place Plan geographies are well*

*established and represent areas with functional relationships with each other and as such have been used to capture the infrastructure needs of Shropshire in a manageable way. For the purposes of the Shropshire Local Plan they are used to present a series of localised strategies, although they in themselves have no planning status.*

The soundness of the Council's approach is questionable on the basis that it results in some areas which are far removed from the Black Country being included in the latter stages of assessment, while settlements which are much closer to the Black Country are excluded due to the market town on which the relevant Place Plan Area is based falling outside the Black Country area of influence. This leads to some peculiar results. By way of an example, Nesscliffe is a small settlement within the Shrewsbury Place Plan Area, and closer to the Welsh border than Shrewsbury itself. The driving distance to Dudley (part of the Black Country) is 47 miles and over one hour driving time. The corresponding distance from Cleobury Mortimer (Place Plan Area S6) to Dudley is 26 miles and under one hour drive, but Cleobury Mortimer is excluded from the assessment at the first stage of the assessment.

Similarly, driving distance from Nesscliffe to Wolverhampton (Black Country) is 42 miles with a drive time of one hour while Hinstock, which falls within Place Plan Area S11 (Market Drayton) is 26 miles and a 40 minute drive to Wolverhampton.

The Council's approach to determining where the unmet Black Country need should be accommodated is therefore fundamentally flawed at the outset and does not assess all potential and most desirable and sustainable locations for accommodating the Black Country's unmet housing need.

The proposed approach of allocating significant proportions of housing within existing proposed allocations to accommodate the unmet need from the Black Country rather than allocating new sites undermines the wider aims of the plan and the area-specific strategies within the plan.

As an example, S3. Bridgnorth Place Plan Area, S3.1. Development Strategy: Bridgnorth Principal Centre sets out that sets out at part one:

*'Bridgnorth will fulfil its role as the second largest Principal Centre and contribute towards strategic growth objectives in the east of the County, delivering around 1,800 dwellings and making available around 49ha of employment land to create choice and competition in the market. New housing and employment will make provision for the needs of the town and surrounding hinterland, including*

*attracting inward investment and allowing existing businesses to expand’.*

Despite the quantum of housing proposed within allocations and other means of delivery, the Council can no longer provide for 1,800 units for local demand in the Bridgnorth allocation, as required in the Bridgnorth Place Plan Area commentary, as 600 units, (one third of the units allocated) will now be allocated to demand arising from the Black Country.

The Council cannot reasonably make up this difference by increasing densities and increasing windfall allowances within the area as this measure has already been employed in order to meet the 500 dwelling uplift also considered as part of the revised SA exercise. In addition, the nature of a windfall allowance means that the location and nature of such development cannot be accurately predicted and its impacts appraised, undermining the accuracy and value of the SA before us.

This matter can only be resolved by allocating additional sites to ensure that Bridgnorth maintains a sufficient supply of housing to meet its local need, as well as the unmet need for the Black Country.

The Council’s approach to simply apportioning elements of existing allocations to meet Black Country and in doing so displacing provision which was originally intended to meet locally arising housing need continues to fail to fully assess the environmental impact of accommodating the unmet need from the Black Country. As the Inspectors set out at in January 2024 [para 4.1 ID36] the Council had failed to *‘look at what the environmental impacts are of meeting some of the unmet needs of the Black Country i.e. 1500 homes and 30ha of employment land, in addition to meeting its own needs. Instead, what the revised SA does is amalgamate the Black Country’s unmet needs into its own growth options and at the same time alter the growth options compared to earlier SA work. This needs to be assessed as a distinct and separate exercise’*. While the updated SA appears to assess the impact of accommodating the 1,500 need within Shropshire by apportioning elements of three existing allocations to meet this need, the Council does not allocate additional sites to accommodate the 1,500 units required to be meet housing need from within Shropshire. There is therefore a demand for 1,500 units, whether arising in Shropshire, the Black Country or elsewhere, for which there is not a corresponding allocation and therefore cannot be appraised. This equates to almost 5% of the 31,300 unit demand identified within the plan which are not being appraised. The plan

	<p>therefore cannot be considered sound in its current form as the SA does not offer a sufficiently robust or thorough impact of the potential impacts of the plan.</p> <p>Furthermore , the basis of the plan now being promoted is substantially different to the basis on which it was prepared at previous consultation stages. The current consultation is focussed on four highly technical documents which are likely to be beyond the interest of a causal observer and have little information on how the proposed change in tack will impact development in Shropshire over the next decade. When considered cumulatively, the changes to the plan since pre-submission stages to that currently being considered have diverged dramatically and, as we have set out above, are not supported by sufficiently robust and thorough evidence.</p> <p>We are also aware of Pre-Action Protocol (PAP) correspondence prepared by a third party. Having reviewed this correspondence and documents issued by the Council and the Inspectors response , we do not have confidence that the documents currently being considered adequately address the concerns raised in the PAP letter; we are concerned that the Council remains at substantial risk of challenge if it continues to progress the plan in its current form. The Council must consider returning to an earlier stage in the plan preparation, taking forward an accurate housing need figure, allocating sufficient land to meet this need, and corresponding demand and allocations for employment land, and undertaking an appropriate and robust assessment of all potential impacts from the outset, rather than seeking to retrospectively apply an assessment to issues for which it was not designed to consider.</p>
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## 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:	Stanmore Consortium
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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 type="checkbox"/>
<b>b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.</b>	<input type="checkbox"/>
<b>c. Updated Housing and Employment Topic Paper.</b>	<input 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):	Please see attached document: Stanmore Consortium-Green Belt Topic Paper Reps 2024
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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.**

Please see attached document: Stanmore Consortium-Green Belt Topic Paper Reps 2024
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*(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.*

Shropshire Local Plan

Updated Green Belt Topic Paper

June 2024

Document Identification	Detailed Comments
<ul style="list-style-type: none"> <li>• Updated Green Belt Topic Paper</li> <li>• Chapter 8</li> <li>• Concerns over soundness</li> </ul>	<p>Green Belt Topic Paper</p> <p>The allocation of the employment sites at Stanmore are supported as they are necessary extensions to the Stanmore Business Park (formerly Industrial Estate).</p> <p>The recognition that Stanmore Business Park is a significant employment site associated with Bridgnorth which is a centre of excellence for engineering and advanced manufacturing and a key employment location in the County is supported.</p> <p>In respect of need and exceptional circumstances for the employment allocations set out in the Green Belt Topic Paper, it is important to take into account the representations submitted on behalf of the Stanmore Consortium at the Regulation 18 &amp; Regulation 19 Stages of the Local Plan. For information these representations included the Green Belt Exceptional Circumstances Paper prepared by Stansgate Planning in 2020 (Appendix L) and the report prepared Macmullen Associates in March 2020 (Appendix S) which set out the case for the expansion of Stanmore Business Park.–. An addendum to this report was also prepared by MacMullen Associates February 2021 to provide an updated position on occupation of the business park and alternative locations for employment in Bridgnorth. It confirms the business park is running at capacity with older buildings being refurbished as they become available before being re-let.</p> <p>As stated in the Regulation 18 &amp; 19 representations the Stanmore Consortium do not support Paragraph 8.7a (i) in respect of the delivery of new residential development being delivered through the allocation of a further significant mixed-use sustainable urban extension allocation at Tasley (BRD030), which is located outside of the Green Belt to meet the requirements of Bridgnorth.</p> <p>The Topic Paper sets out the Council’s approach to determining where the unmet Black Country need should be accommodated (Paragraphs 8.13 – 8.17 ) It is considered that the approach is flawed at the outset and does not assess all potential and most desirable and sustainable locations for accommodating the Black Country’s unmet housing need. In paragraphs 8.13- 8.17 of the Topic Paper, Site reference BRD030 known as Tasley Garden Village, has been identified by the Council as an appropriate location to accommodate 600 dwellings to contribute to the unmet needs of the Black Country. The Council has stated that ‘Bridgnorth’, not the site itself, ‘has a functional relationship to the Black Country’ The focus of the Topic Paper is on the location of</p>

	<p>Bridgnorth as a whole and its connectivity to the Black Country, rather than the specific location of the site itself. The approach taken, which is underpinned by the SA does not take into account the issues of travelling from the west of Bridgnorth to the Black Country, particularly when factoring in peak hour commuter traffic. This raises the question of how sustainably located this area to the west of Bridgnorth is in terms of proximity to the Black Country.</p> <p>The Stanmore Consortium submission at the Regulation 18 &amp; Regulation 18 Stages demonstrates that exceptional circumstances exist to support the release land for Stanmore Garden Community (BRD032) from the Green Belt, the exceptional circumstances have been reinforced by the Council's proposal to release Green Belt for employment land at Stanmore and the Garden Community would consolidate this to deliver sustainable development.</p>
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