

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:	Bill Griffiths, Clerk to Tasley Parish Council
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input checked="" 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 checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input checked="" type="checkbox"/>

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

Paragraph(s) :	Please see attached document "TPC - 2024-06-11 - SLP Representation.pdf".
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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 "TPC - 2024-06-11 - SLP Representation.pdf".

(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.



Tasley Parish Council Representation in response to the Shropshire Local Plan Examination: Further Consultation

This representation has been drawn up by Tasley Parish Council (TPC) on behalf of its parishioners in response to the consultation titled '*Further Consultation Focusing on Additional Material Prepared in Response to the Planning Inspectors Interim Findings*' being carried out by Shropshire Council (SC). This consultation was launched on 25th April 2024 and, at present, is scheduled to close on 11th June 2024.

TPC's comments are in response to all four documents published in this consultation bundle, and founded upon comments made in both our Regulation 19 (R19) representation of 26th February 2021 in response to SC's emerging Shropshire Local Plan (SLP), and subsequent representation of 5th May 2022 in response to the Planning Inspector questions arising from their analysis of SC's emerging SLP submitted for examination in June 2021.

Our comments are listed below, and where possible, detail the relevant consultation document addressed:

1. TPC does not consider the consultation documents to be sound, consequently we consider them to be unlikely to be legally compliant too.
2. This consultation consists of a poor-quality set of documents that are not conducive to public comment; for example, the consultation material did not include a map so it is difficult to identify which sites are being assessed, and there is no indication provided of what has been changed since the previous version; some information is out of date and Appendix 4 (Bridgnorth) of the Additional Sustainability Report still refers to the Industrial Poultry Units at the Tasley Garden Village site, which have been refused planning permission and are no longer relevant. It is therefore difficult to comment meaningfully on the updated site appraisals. This gives rise to a concern about whether consultation respondents have been able to give the matter conscientious consideration.
3. The consultation document bundle is a collection of documents comprising 1,572 pages of technically nuanced information with links to numerous further pages, and in addition, the original draft SLP document bundle that needs to be referred to comprises of over 10,000 page containing links (many broken) to a further untold number of documents (with embedded links to other documents, and so on), as well as the Black Country documents; another sizeable bundle. This consultation once again fails the 'Gunning Principles', which makes clear that "*The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees [the community] to provide an informed response*".
4. The individual Settlement Strategies for individual settlements have not been assessed and consequently a full assessment has still not been done, relying in the overall conclusions of the assessment of the spatial approach and the individual site appraisals. Consideration should be given to whether the individual site assessments

provide an adequate assessment of the growth strategy for the settlement in which they are situated.

5. Comments relating to site allocation BRD030 referred to in Appendix 4 (Bridgnorth) of the Additional Sustainability Report:

5.1 The Tasley Garden Village (TGV) site accommodates 600 houses as part of the proposed contribution to the unmet housing need forecast to arise within the Black Country. Furthermore, the site performs poorly in Stage 2a Settlement Sustainability Appraisal for housing and employment and only performs fair in the Stage 2a Black Country Contribution Sustainability Appraisal for housing and employment. However, the Black Country authorities are not now preparing a single Black Country plan and have started to prepare their own individual plans. Prior to the cessation of work on the Black Country Plan, it was identified that the major housing shortfall would arise in Sandwell, which historically has been around 16% of the migration into Shropshire. Dudley was projected to have a surplus of delivery over requirements. Wolverhampton had a deficit but this was heavily influenced by its housing requirement being uplifted by 35% as one of the country's 20 largest cities; the government's expectation is that the 35% uplift is delivered in the city, not exported to neighbouring authorities. Sandwell and Dudley have now carried out regulation 18 consultations on drafts of their local plans, which both now run to 2041; Sandwell is continuing to forecast a substantial housing shortfall, whilst for Dudley it is 1,078 over their plan period. Wolverhampton has carried out an Issues and Options Consultation; there is a potential shortfall of 11,400 homes, but this includes the 35% city uplift.

5.2 SC has not provided evidence to justify its policy of uplifting the number of dwellings required by central government by a further 19%. Neither has SC justified its decision to take on the Association of Black Country Authorities '(ABCA) anticipated unmet, and as yet unratified, housing quota. Planned SAMDEV housing already includes 550 dwellings in Tasley Parish, whilst the viable option to convert existing business properties to residential should also be considered by SC as this would be more sustainable, particularly given the lingering adverse effects of the pandemic on businesses.

5.3 Whilst Bridgnorth has links to the Black Country, the TGV site is situated on the Ludlow and Shrewsbury roads, where any links with the Black Country are at their weakest. Travel to the Black Country conurbation, both from the already approved Tasley Gateway (TG) development of 550 houses and the proposed TGV site, would necessitate driving down the Bridgnorth by-pass (A458) and is likely to lead to congestion at the roundabout at the intersection of the A458 and the A442 in Bridgnorth at peak periods. Assessment for the cumulative traffic caused by both developments is very much needed. In a recent questionnaire about our Neighbourhood Development Plan approximately 43% of those who responded said they would be driving to work via the A442/A458 roundabout.

5.4 The entire highways infrastructure in and around Bridgnorth is already showing signs of capacity constraints even before any of the sites allocated under SAMDev

are developed, and would need to be substantively improved to accommodate estimated increase in traffic resulting from 'Garden Village' developments such as TGV and Stanmore Garden Village (SGV), yet no overall Highways Assessment had been carried out. Neither has a local Housing Needs Assessment nor detailed Infrastructure Plan been provided as part of the SLP evidence base to justify the ability of the area to absorb the proposed level of development at either SGV or the officer-preferred TGV site. The roads between Bridgnorth and Wolverhampton, Dudley and Stourbridge are already choked with congestion, especially at peak times, at the pinch-points at the boundary of Wolverhampton (A454), at Himley on the border of Dudley (B4176), and at Stourton (A449). The A454 has to absorb the additional commuter traffic from nearby Perton, and the B4176 already has extra traffic from the new garden village built at Wombourne. The development of BRD030 would inevitably lead to substantial extra traffic to the Black Country and would be counter to Sustainability Objectives 5 (encourage the use of sustainable means of transport) and 6 (reduce the need of people to travel by car).

5.5 Should the proposal to move the Black Country's unmet housing need to a prime arable greenfield site close to protected wildlife habitats in Tasley come to fruition, it would extend urban sprawl into an area that many residents and visitors enjoy and value. A Black Country Authority has recognised people increasingly value green space and do not want to lose it and as a consequence has removed two Green Belt sites allocated for housing development (namely, grazing land at Wollaston Farm, and land at Guys Lane, Lower Gornal) from its draft Local Plan. This change of strategic intent is consistent with National Government policies for protecting the environment, biodiversity, and taking action against climate change.

5.6 The TGV site promoter Taylor Wimpey's (TW) proposal includes 16ha of employment land for B1, B2, B8 usage, i.e. offices, R&D, light manufacturing, storage and distribution. TW's display boards state *The Garden Village would provide around 16 hectares of employment land to meet the needs identified within the emerging Shropshire Local Plan Review.* A further 6.3ha is planned within the SAMDEV employment land allocation in Tasley Parish. Currently there are only a few major employers, i.e. those with >100 employees, in Bridgnorth, and 90% of Bridgnorth businesses employ fewer than 10 people. No major employers have relocated to Bridgnorth in the last 20 years. Historically, employers are not highly attracted to Bridgnorth, particularly as it takes up to an hour to reach the M6 or the M5/M42 road links when compared to better access from the likes of Wolverhampton, Telford, and Shrewsbury.

5.7 Shropshire's draft Local Plan was prepared prior to the conflict in the Ukraine, which has caused UK food security, particularly in cereals and vegetable oils, to become a priority. We feel this should be reflected in the SLP because the world food situation renders any policies justifying large housing developments, such as the TGV site, on prime arable land potentially unsound.

5.8 The site assessment for the TGV gives positive points for being a brownfield site and for a primary school already being within 480 metres. This is untrue; the site is on prime farmland and Castlefields School is not within 480 metres of the proposed

site. The distance, either walking or driving, to Castlefields from the TGV site would be more like 1 kilometre because of the roads and paths in this area of Bridgnorth and the journey would necessitate crossing the busy A458. If the plus scores are removed on those points so as to achieve a more honest and open assessment, then the overall scores of BRD030 for both housing and employment land change from "Fair" to "Poor".

5.9 The TGV site is located within the Impact Risk Zone for two SSSI's and one local wildlife site and a recent planning application for industrial poultry units has already been refused on grounds of further polluting already damaged and polluted SSSIs even with mitigation in place. Shropshire Council states that these SSSI and local wildlife sites will be safeguarded and appropriately buffered, TPC does not consider the proposed mitigations to be sufficient to protect these sites from further environmental damage. On a further note, air quality in Bridgnorth is already recognised as being poor.

5.10 The TGV site contains two Grade II listed buildings and several non-designated heritage assets. A Heritage Assessment provided by the Promoters indicates that harm would arise to the significance of these designated heritage assets as a result of the changes that would occur to their settings. TPC does not consider the proposed mitigations through appropriate design and layout of development and incorporation of effective Green Infrastructure would minimise the impacts on these assets.

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

7. There is a general impression that overall Tasley is regarded as suitable to accommodate homes being built to address the needs which cannot be met within the Black Country, and proximity and transport links appear to be a key factor. The Black Country is referred to in general terms rather than as specific places within it, notwithstanding that the individual boroughs are now preparing separate plans. Wolverhampton and Dudley are more accessible from Tasley than Sandwell or Walsall. However, the people of Tasley and Bridgnorth are all too aware that there are poor public transport links with the Black Country, and that these have dwindled over time. An hourly bus service to Wolverhampton is all we have. The earliest arrival time in Wolverhampton centre is 8.39 and the latest you can leave to return to Bridgnorth is 18.15 - neither suitable for many jobs. Thus it is very likely that everyone will drive. Whilst there is a direct bus from nearby Bridgnorth to Wolverhampton, the bus service to Dudley involves a long journey either changing at Wolverhampton or Kidderminster. Whilst the bus services to Sandwell and Walsall are long and entirely impractical involving numerous changes.

8. TPC's 26th February 2021 representation set out a statement of facts evidencing the failure of the emerging SLP to meet the test for soundness and legal compliance including the duty to co-operate, along with 41 material concerns raised over the allocation of prime arable land in Tasley for a mixed "*Garden Village*" development (SLP ref: BRD030).

9. In its 5th May 2022 representation regarding the revised SLP submitted for examination in July 2021, TPC drew the Planning Inspector's attention to the fact that there was no evidence to suggest any change had been made to the BRD030 site allocation nor inclusion of any change in strategic intent resulting from the material concerns raised by TPC in 2021.

10. In this consultation, TPC once again finds no evidence to suggest any change had been made to the BRD030 site allocation nor inclusion of any change in strategic intent resulting from the same material concerns first raised by TPC in 2021.

TPC continues to unanimously object to the BRD030 site allocation for a mixed "*Garden Village*" development in Tasley parish.

Whilst we are in no doubt about the importance of getting a Local Plan for Shropshire adopted, and wish to constructively contribute toward achieving that end, Tasley Parish Council finds itself once again unable to support the current version of the Shropshire's emerging SLP.

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