

Stage 2 Hearing Statement
Matter 9 (Bridgnorth) regarding Stage 2a Housing Appraisal for BRD030
(Tasley Garden Village)

By Andrew Coley (B-A079) for BRIDGNORTH CIVIC SOCIETY

11 September 2024

1. In our initial Response, Bridgnorth Civic Society (BCS) raised concerns about the inaccurate assessment of Criteria 5 in which Shropshire Council (SC) stated that the boundary of the site is “within 480 metres of a primary school”. We stated that this is factually incorrect as the only primary school nearby is Castlefields, which we estimated to be more than 1 kilometre from the boundary of BRD030 when accessed either by foot or by vehicle, due to the geography of that area. SC responded (p.105 of their Response Summary) that it considers that the Stage 2a assessment is proportionate and robust, and that it should be noted that measurements within the Stage 2a SA are “as the crow flies”. We find this response to be wholly inadequate and inaccurate, demonstrating a lack of understanding of the geography of the land between BRD030 and the school. Children do not travel to school “as the crow flies”, but by public rights of way in the form of roads, footpaths and cycleways. We have since revisited the site and estimate that Castlefields School is about 700 metres from the boundary of BRD030, using the existing footpaths. Even then, there would be a need for safe means of crossing Bridgnorth Bypass such as by a footbridge. We further comment that although the developers have indicated that the site would include a new primary school, no details have been provided as to when in the site’s phased construction this would be built, or how it would be paid for. We honestly believe that realistically it would be one of the final buildings to be constructed, if at all, leaving the residents of Tasley Garden Village with no primary school nearby. SC has yet to assess whether the nearest primary school is likely to have capacity to expand so as to accommodate the additional children from BRD030.
2. We stated that SC’s assessment that BRD030 is wholly or partly brownfield / previously industrial / potentially contaminated land was incorrect. Disappointingly, SC responded with a vague, generalised statement that previous industrial / potentially contaminated land is often found within agricultural fields. BCS strongly disputes this concerning this specific site and notes, despite SC stating that theirs was a “high-level response”, that no evidence has been provided to support SC’s assertion. BCS stands by its view that the whole of BRD030 is greenfield, and that the assessment should be scored honestly and accurately to reflect this. We believe that SC has overlooked the agricultural land quality of this site. We are mindful of the Government’s view on the importance of food security and safeguarding the best and most versatile agricultural land. BRD030 does include some agricultural buildings, but these are currently considered to constitute greenfield land. This site is not and never has been a brownfield site.
3. BCS remains of the view that SC has incorrectly scored the assessment of BRD030 on the above two criteria. We are adamant that an honest, accurate scoring would result in the site being scored as “Poor”, not “Fair”.
4. BCS expressed concerns that there is double counting of local need, with any new homes on BRD030 being surplus to local needs, due to the intended development of 500 dwellings at the nearby Tasley Gateway. We remain of this view, being mindful that SC itself considers that the current housing need for the whole of Shropshire is some 1,070 dwellings, which could increase to 1,561 dwellings using the proposed new “standard methodology” of the NPPF. We are disappointed that SC rebutted this by stating that a robust and proportionate site assessment process has been undertaken, identifying appropriate sites to accommodate the proposed contribution

to the unmet needs forecast to arise in the Black Country. We regard SC's response as dismissive and lacking in any meaningful detail. We understand that the unmet needs forecast to arise in the Black Country apply specifically to Sandwell Metropolitan Borough. Further, we dispute that Sandwell actually meets the definition of being a "closely related Local Planning Authority" to Shropshire, as there are two or three local planning authorities (South Staffordshire Council, Dudley Metropolitan Council and Wolverhampton City Council) that stand between Shropshire and Sandwell. There appears to have been no analysis undertaken of migration to Shropshire by people intending to commute to Sandwell. It is a fact of simple geography that any person commuting from Shropshire to Sandwell can only do so by traversing Dudley or Wolverhampton, making for a lengthy journey in both miles and time. BCS remains of the view that the 1,050 new dwellings planned for BRD030 would exceed local need and would be disproportionate as part of the contribution to the unmet needs forecast to arise in the Black Country, which SC itself identifies as a total of 1,500 new dwellings.

5. We stated concerns that the proposed development of BRD030 would not be within the existing capacity of current sewage treatment facilities, which are at Eardington, near Bridgnorth. We are disappointed that SC has failed to address this specific concern. It appears that SC regards this as a matter that would be for a developer to address. We remain of the view that such development could lead to the risk of untreated sewage being discharged into the River Severn, contrary to Sustainability Objective 9.
6. BCS stated that the affordable housing contributions for BRD030 (and other sites) to be unambitious. SC has responded that it considers the proposed affordable housing contributions are appropriate. We respectfully submit that SC's position lacks justification, especially in view of the Government's intentions to increase the proportion of affordable housing in the reformed National Planning Policy Framework.

Bridgnorth Civic Society
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