



# The countryside charity Shropshire

**Examination of Shropshire Local Plan 2016-2038**

**Stage 2 Matters, Issues and Questions**

**Matter 9 – Bridgnorth Place Plan Area (policy S3)**

**CPRE Shropshire Hearing Statement**

**Representor refs: A0410 and B-A127**

**20 September 2024**

1. Our Hearing Statement for Matter 9 follows the MIQs as set out in document ID40.

***Matter 9 – Bridgnorth Place Plan Area (policy S3) – see MMs 081-083***

***Issue***

***Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.***

***Sites***

***BRD030 – Tasley Garden Village, Bridgnorth***

***ALV006 & ALV007 – Land north of Daddlebrook Road and west of A442, Alveley***

***ALV009 – Land adjacent to The Cleckars, Alveley***

***DNP009 – Land off Derrington Road, adjacent to Brown Clee Primary School, Ditton Priors***

2. The above four sites are the only ones listed in the MIQs document ID40. However, Policy S3 also lists the following employment land sites, which are not captured in the above MIQ list.

***P58a - Land north of Stanmore Industrial Estate***

***STC002 – Land adjacent Hickman Road, Stanmore Industrial Estate***

3. These two sites are subject to Main Modifications MM082 and MM083. Just as site BRD030, which is subject to MM081, is included in the Matter 9 considerations as above, so too surely should be these two employment sites.

***Questions***

4. Our Regulation 19 submission of February 2021 concentrated, for the Bridgnorth Place Plan Area, on the balance between housing numbers and employment land for Bridgnorth, and on the allocations of employment land.
5. In relation to that, we now comment briefly in this Hearing Statement mainly on the following selected questions only.

***Q1. What is the background to the site allocation? How was it identified and which options were considered?***

***Q12. Are the detailed policy requirements effective, justified and consistent with national policy?***

6. In paragraphs 16.1 – 16.5 of our Regulation 19 submission of February 2021 we pointed out how the employment land guideline for Bridgnorth had been increased by the Council from the original “balanced” figure of 16Ha, first to 28Ha, and finally to the presently proposed 49Ha,

without any quantified justification for this massive proposed increase in the guideline figure, or for the departure from balance with the housing guideline.

7. Shropshire Council responded to our submission on policy S3 in their Summary of Representations on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan dated July 2021 (document SD014.01 at electronic page 776 (Schedule 2: page 726)). The Council did not appear to address this specific point as to quantified justification, saying chiefly that it believed its policy to be appropriate, effective, sustainable and deliverable.
8. We also noted that the allocation of the proposed Taylor Wimpey 'garden village' sustainable urban extension site at Tasley was not consistent with the continued allocation in the Green Belt at Stanmore, as far as the employment land allocation is concerned.
9. We therefore continue to argue that the proposed employment land guidelines for Bridgnorth are unsound, because they are not supported by proportionate evidence, and that therefore the quantum of employment land proposed for Bridgnorth, including that proposed to be released from the Green Belt, needs to be reappraised.
10. The planning process is already underway for site BRD030 above and on 6 September 2024 Shropshire Council issued Scoping Opinion reference 24/02859/SCO. The Council will need to ensure that any resulting planning application complies with policy S3 as revised by Main Modification 081, in particular that 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.
11. Site BRD030 has also been identified to accommodate 600 out of the proposed 1,500 dwelling contribution to the Black Country. Our comments on Matters 1 – 4 are relevant here in so far as they question the appropriate quantum of housing and employment land need and in particular the contribution to Black Country unmet need.