

**BRIDGNORTH TOWN COUNCIL**



Shropshire Local Plan Examination Stage 2

**Matter 9**

Bridgnorth Town Council  
Shropshire Local Plan Examination Stage 2  
Hearing statements

# BRIDGNORTH TOWN COUNCIL



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## Matter 9

<b>Place Plan Areas and Site allocations</b>	
<b>Matter 9 - Bridgnorth Place Plan Area (policy S3) – see MMs 081-083</b>	
<b>Issue</b>	Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy. NB safeguarded land is not included as this is not allocated for development in this Plan.
<b>Question 1.</b>  Is the approach taken to development in the Place Plan Area, justified, effective and consistent with national policy?	
<b>Bridgnorth Town Council response:</b>  <ol style="list-style-type: none"><li>1. The Bridgnorth development strategy as set out in Policy S3.1 does not accurately describe what is currently proposed. Paragraph 1 of the policy states: “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”. The proposed 600 homes to meet Black Country needs, representing 1/3<sup>rd</sup> of the housing proposed for Bridgnorth over the plan period of 2016 – 2038, do not represent provision for the needs of the town.</li><li>2. Within 5.53 the proposed scale of development is explained as recognising “.....c. The low levels of residential completions achieved within the town over a number of years which has exacerbated local need.” This appears to be evidenced by Appendix 5, which indicates 52 completions over the 3 years 2016 – 2019.</li></ol>	

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3. SAMDev housing allocations BRID020a and BRID020b (originally 500 homes) have not yet proceeded to development during the plan period, but they are expected to be delivered and are now progressing through the planning application process. It has not otherwise been evidenced that local need has been exacerbated by low levels of housing development and needs to be met with a higher level of development. The footnote on page 115 of the adopted SAMDev Plan explained that Bridgnorth had grown by 1.7% p.a. over the period 2006-2013 and the planned rate of growth for the period 2013 – 2026 averaged 0.9% p.a., whilst planned growth in Shropshire overall was 1.06% p.a. for the SAMDev plan period. Development of 1,400 dwellings in Bridgnorth was expected over 20 years; this equates to approx. 1.18% p.a. For the current plan period, Shropshire as a whole is expected to grow by around 1% p.a. (excluding the impact of providing homes to meet Black Country needs) and it would therefore be more appropriate to view Bridgnorth's requirement as being at or slightly lower than the SAMDev planned level (which was 70 homes p.a.) It would be more realistic to view the level of residential development required to meet Bridgnorth's needs as 66 homes p.a., or 1,452 over the 22 year plan period.
4. If it is proposed that Bridgnorth should be required to contribute homes to meet the Black Country's future needs, this should be explicitly referred to in policy S3 and an explanation given as to why a particular level of additional housing is felt to be appropriate in the Bridgnorth context.
5. We further note that in Table 8.1 of the updated Housing and Employment Topic Paper April 2024 that the housing completions figure for Bridgnorth for 2016 – 2023 is 132 homes, all of which was "windfall" (average 26 p.a.). Allowing for 550 homes to be built on the Saved SAMDev allocations, in line with the outline planning permission which has now been granted, this is now presented in Table 8.1 as meaning that only 7 windfall completions are required in Bridgnorth over the 15 years 2024-2038 to provide the local plan guideline of 1,800 homes. An alternative view might reasonably be that that the assumed level of windfall development in the plan is too conservative and should be (say) 15 homes per year over the plan period, or 330 homes. New site allocations for 570 homes (1452-550-330 = 572), rather than 1,050 homes, for the plan period would appear to be sufficient for Bridgnorth's needs – in line with the suggestion in our response to the

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Regulation 19 Consultation that the level of housing development proposed for Bridgnorth should be reduced by around 500 homes.

6. We do not feel that the development approach for the Bridgnorth Place Plan area is Justified. For the plan to go forward for adoption, the development guideline for Bridgnorth should be reduced to reduce the risk of unforeseen adverse consequences. We further consider that the identification of a future direction of growth (which is not an allocation) is inappropriate and should be deleted; site allocations in future revisions of the plan should be assessed on a neutral basis and not pre-determined by this identification.

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#### Sites - BRD030 – Tasley Garden Village, Bridgnorth

The following questions should be answered by the Council for each individual site allocation. In responding to the questions, the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc. In addition, an up-to-date position should be provided in relation to the planning and development status of each site. Representors do not necessarily need to cover all of these points in their statements.

#### Question 1.

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

#### Bridgnorth Town Council response:

7. The Bridgnorth Development Options Assessment (EV13) provides a comprehensive statement of the relative merits of the proposed Tasley Garden Village site and the proposed Stanmore Garden Village site. However, it does not consider the rationale for selecting a single large site and not allowing other promoted sites to come forward. We note that the question of compliance with NPPF July 2021 paragraph 69 (10% of their housing requirement on sites no larger than one hectare) is considered as part of Matter 3 in respect of the whole plan. However, we consider that the rationale for this provision of NPPF para 69 (mix of sites, often delivered quickly) equally applies at a local level and regret that no smaller sites are allocated in the Bridgnorth area.

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#### Question 2.

What is the scale and type/mix of uses proposed?

#### Question 3.

What is the basis for this and is it justified?

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#### Bridgnorth Town Council response:

8. We have commented earlier on the scale of housing development proposed for the Bridgnorth area during the plan period, and our view that it is excessive. We further consider that the inclusion of 600 homes (57% of the development guideline for BRD030) to meet Black Country needs (MM082) is arbitrary in nature; there is no clear rationale for why Shropshire as a whole should contribute 1,500 homes, and this site 600 homes, rather than some other number.
9. The proposed uses include a new local centre, which in our view emphasises the disconnected nature of the proposed development from Bridgnorth Town and other development areas in Tasley. For example, the development guidelines for the saved SAMDev allocations BRD020a and b also include a “local centre” and it would be much better if there were one in the community of Tasley but this is impractical due to the barrier nature of the A458.
10. We are also concerned that MM082 makes provision for the possibility of the open space requirement not being provided onsite but elsewhere; this undermines the fundamental principle of this type of development and in our view is unacceptable.
11. We note with concern the representation made by respondent A070 (Bloor Homes and Taylor Wimpey) to the April 2024 consultation on the updated housing and employment topic paper. They appear to be suggesting that a greater number of homes at site BRD030 be allocated to meet the Black Country’s projected unmet housing needs, and that the site could be developed more quickly and expand into the Future Direction of Growth during the Plan period. In the light of our concerns about infrastructure and urban capacity in Bridgnorth we could not support such a proposal and consider it would be likely to lead to excessive commuting, if adopted, and would be unsustainable.

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##### Question 8.

What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

##### Question 9.

Is the site realistically viable and deliverable?



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#### Bridgnorth Town Council response:

12. The concerns we expressed about local infrastructure and urban capacity in the Bridgnorth area in previous submissions have not been addressed. The Bridgnorth Development Options Assessment (Evidence Base document EV13) was carried out after the Regulation 19 Consultation and section 6.4 of Appendix 1 identifies that highway junction improvements would be needed whichever of the 2 Garden Village proposals were selected. The work needed does not feature in the updated Shropshire Strategic Infrastructure and Investment Plan GC54 nor is it referred to in the development guidelines for Tasley Garden Village other than through a generic statement that “Any necessary improvements.....will be undertaken”. The highway modelling work presumably did not take into account journeys associated with development being orientated towards meeting Black Country needs and so does not fit the current development proposal. Further, we see no sign that improvements which may be needed in Bridgnorth Town Centre (including parking and the public realm) have been investigated.
13. We are also concerned that there is no accessible costed infrastructure plan nor quantified explanation of where the required funds will come from. The Viability Study EV115.01 included a statement at 10.83 that “The seven potential Strategic Sites have been identified and tested. In considering these it is important to note that the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites” and gave a current best estimate for the Tasley Garden village development of £13.94m requirement for S106 obligations. We thus have low confidence that the required infrastructure has been fully identified and that funding for it is clearly identified.