



Matter 9 Bridgnorth Place Plan Area Policy S3 MMs 081-083

Worfield and Rudge Parish Council consider that the policy S3 will cause the Plan to be unsound because:

- I. The policy does not reflect what has been proposed and does not reflect the needs of the Place Plan area.
- II. The policy is not justified because it is not based on appropriate robust evidence.

Background

MM081

- 1.1. Bridgnorth development strategy as set out in policy S3.1 does not accurately describe what is currently proposed. Para 1 of the policy states: “New housing and employment land 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 the Black Country needs, representing 1/3rd of the housing proposed for Bridgnorth Place Plan area over the plan period of 2016 to 2038, does not represent provision for the needs of the town.
- 1.2. The lack of allocation of land for Bridgnorth Aluminium [1], a major employer, does not represent provision for the needs of the town. We refer to Matter 26 to cover this topic.
- 1.3. Within explanation note 5.53 the proposed scale of development is explained as recognising “... 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 3 years 2016-2019.
- 1.4. 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 process. It has not otherwise been evidenced that local need has been exacerbated by low levels of housing 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 1400 dwellings in Bridgnorth was expected over 20 years; this requires approximately 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 Need) and it would therefore be more appropriate to view Bridgnorth’s requirement as being at or slightly lower than SAMDev planned level (which was 70 homes p.a.) it would be more realistic to view the level of residential development required to meet the Bridgnorth’s needs at 66 homes p.a. , or 1452 over the 22 year plan period.
- 1.5. If it is proposed that Bridgnorth should be required to contribute homes to meet the Black Country needs, this must 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.



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- 1.6. 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 to 2023 is 132 homes, all of which were 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 7 windfall completions are required in Bridgnorth over the next 15 years 2024 to 2038 to provide local plan guideline of 1,800 homes. An alternative view might reasonably be that the assumed level of windfall development in the plan is too conservative and should be increased, circa 15 homes p.a. over the plan period, or 330 homes. New site allocations for 570 homes (1452-550-330=572), rather than 1050 homes, for the plan period would appear to be sufficient for Bridgnorth's needs- in line with the suggestion in our response to regulation 19 Consultation that the level of housing development proposed for the Bridgnorth Place plan area should be reduced by around 500 homes, to no more than 1000 dwellings. (1000 dwellings includes saved SAMDev allocations).
- 1.7. Under the circumstances we feel that, 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.

Question 1 -Site allocation

- 1.8. 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. However, it does not consider the rationale for selecting large sites and not allowing other promoted sites to come forward. We note that the question of compliance with NPPF para 69 is considered as part of Matter 3 in respect of the whole plan. However, we consider that the rationale for the provision of para 69 equally applies at a local level and regret that no smaller sites are allocated in the Bridgnorth area.

Question 2 &3 Scale, mix of use and basis.

- 1.9. We commented previously on the scale of housing development proposed for the Bridgnorth area during the plan period, and our view that it is excessive. We further considered that the inclusion of 600 homes (57% of the development guideline for BRD030) to meet the Black Country needs (MM081) is arbitrary in nature; there is no clear rationale for why Shropshire as a whole should contribute 1500 homes, and this site 600 homes, rather than some other number. The proposed use includes 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. We are also concerned that MM081 makes provision for the possibility of open space requirements not being provided onsite but elsewhere; this undermines the fundamental principle of this type of development and in our view is unacceptable.



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Question 8 & 9- Infrastructure

- 1.10. The concerns we expressed about local infrastructure and urban capacity in the Bridgnorth Place plan area and further afield, in previous submissions, have not been addressed. The Bridgnorth Development Options Assessment (Evidence base document EV13) was carried out after 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 Strategic Infrastructure and Investment Plan GC54 nor is it referred to in the development guidelines for Tasley garden Village and Stanmore Business Park other than through generic statement that any necessary improvements Will be undertaken". The highways modelling work presumably did not take into account journeys associated with development being orientated towards meeting the Black Country unmet need 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. We are also concerned that there is no accessibility cost 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 obligation and the Stanmore Village £9.985m S106 obligation. However, has the Tasley Garden village assessment considered the hybrid approach of Tasley Garden Village in addition to requirements related to STC002 and P58a. We thus have no confidence that the required infrastructure has been fully identified and that funding for it is clearly identified.

We revert to Matter 26 when reviewing MM082-MM083

Mr C Furnival

Clerk of Worfield & Rudge Parish Council