

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Brian & Anna Sidoli-Morris (#1/3)
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	Page 518 Ecology	Policy:	Appendix Q	Site:	SHR060	Policies Map:	Click or tap here to enter text.
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Insufficient information provided regarding the pool & it's surroundings to the east:-

1. It is a VERY large wildlife pool, akin to the size of those on Radbrook Fields
2. It is the ONLY priority habitat within SHR060/SHR158/SHR161 & is part of SEN
3. It is a natural pond & maps show it has existed since at least 1888
4. It is classed as lowland fen/swamp, which is important as not a lot of it is left in Shropshire
5. The surrounding corridor habitat requires EXTENSIVE buffering & ENHANCEMENT:
 - (a) to align with Town Plan's green corridors & SEN's network
 - (b) to take into account migrating swans/geese/ducks etc using the grassland for grazing
 - (c) to protect the pond's water quality
6. Contrary to a survey that was carried out recently, it DOES contain amphibians (toads, frogs & newts) & as GCNs are know to exist in SHR110 (which is part of the same "parcel" of agricultural land), it's fair to suppose that GCNs may be present here as well.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Inclusion of the above facts
2. Comprehensive commitment to protection, enhancement & wide buffering of this pond/wildlife area (as per paras 2.21, 2.31, DP12-3, DP12-7, 4.121 & 4.123)
3. Reference to commitment to follow not only Shropshire Council's own policies (Big Town Plan/SEN) but also the governments 25 Year Plan to Protect & Enhance the Environment

(Please continue on a separate sheet if necessary)

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Brian Sidoli-Morris Anna Sidoli-Morris

Date:

24/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Brian & Anna Sidoli-Morris (#2/3)
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	Page 16	Policy:	Appendix Q	Site:	SHR060	Policies Map:	Click or tap here to enter text.
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Within the original Preferred Sites Assessment, SHR060 was given a rating of GOOD. Since then it has been re-rated as FAIR. However, no mention has been made in the assessment matrix of the large wildlife pond, fen/marsh & surrounding grassland to the east of this site. If this was included, it would push the rating for this site towards the boundary of FAIR/POOR. Also, there had been absolutely no inclusion in the assessments of whether a site can achieve the government's mandatory biodiversity gain of at least 10% (ref DP12-3, 4.121 & 4.123). If this were to be included in this site's rating, it would be practically IMPOSSIBLE to achieve any nett gain whatsoever & hence this site will undoubtedly breach the government's mandatory adherence to the 2019 Environmental Act.

(Please continue on a separate sheet if necessary)

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1. A re-rating of the site should be undertaken to align with the comments above.
2. Ultimately, SHR060 should be reclassified as a rating of POOR & be removed from consideration for development.

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Brian Sidoli-Morris	Anna Sidoli-Morris
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Date:

24/01/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Brian & Anna Sidoli-Morris (#3/3)
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- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	Page 517 LVSS	Policy:	Appendix Q	Site:	SHR060	Policies Map:	Click or tap here to enter text.
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- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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The assessment references a section for Shrewsbury LVSS, which includes SHR060 within the area 01SHR-B (i.e. including SHR158/SHR161) & describes the land as: "The parcel is characterised by its gently rolling topography with medium scale agricultural fields". It rates the combined sites as Medium-Low for Landscape & Visual (for residential). It specifically mentions the local wildlife site/pond to the east & makes reference to its ecological value & sensitivity to development. However, as it is providing an overall assessment for the three sites combined, it provides an inaccurate assessment for SHR060. I strongly suspect that if Gillespies were to provide an assessment for SHR060 by itself, the ratings in both Landscape & Visual would come back as HIGH, due to the wildlife pond & the steeply sloping gradients on the east of the site (about half the total field area). So in summary the assessment allocated to SHR060 is totally flawed.

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Provide a re-assessment for SHR060 independently of SHR158/SHR161 & also recognise that SHR060 has two separate/distinct landscapes (the flat fields & the sloping fields down to the wildlife pond).

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	Part B Reference:

Signature:

Brian Sidoli-Morris	Anna Sidoli-Morris
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Date:

24/01/2021

Office Use Only	Part A Reference:
	Part B Reference: