

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:	MR T. B. MORRIS
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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:	<input type="text" value="5.56"/>	Policy:	<input type="text"/>	Site:	<input type="text" value="BRD030"/>	Policies Map:	<input type="text" value="S3"/>
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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.

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.

- Appendix D (Bridgnorth Place Plan Area Site Assessments) shows the sustainability assessment for The Tasley Garden Village (TGV) proposal (BRD030) as FAIR with a score of -8. This is at the margin (Fair is -3 to -8 Poor is -9 to -14). The assessment omits to identify a negative score for Criteria 15 (Site is wholly/partly classified as high landscape sensitivity for residential). The site is on the south of the A458 in a beautiful rural setting. The A458 provides a natural development barrier and the approach from the south along the Ludlow Road through the Mor Brook valley will be destroyed. The site is on a high point sloping to the south so the development will be widely visible. None of this has been considered in the sustainability assessment or the Bridgnorth Place Plan or para 5.56. If the minus score is added to the sustainability assessment this development site would become POOR and for such a large and intrusive development it should be removed from the Local Plan on those grounds alone. The sustainability assessment is not sound.

c/f

2. S3.1 (1) states the development should provide “raised pedestrian and cyclist footbridge over the A458” but then states “subject to ground investigations and available land”. To be a sustainable development pedestrian and cyclist access must be a critical requirement for BRD030 to be included in the Local Plan. If this is not the case the site will contravene the Councils policies on car use, CO2, health etc (SP1.1). If there is no confirmed method of providing safe pedestrian and cyclist access the site should be removed from the Local Plan as unsound.
3. Para 5.56 does not state how the TGV development can be integrated into the rest of Bridgnorth, given the significant barrier provided by the A458 nor does the evidence document “Summary of the Assessment of Garden Village Proposals in Bridgnorth”. This is a crucial aspect of the proposal that has not been addressed although the evidence document acknowledges “potential segregation” but offers no proposals merely stating “necessary improvements to pedestrian and cycle facilities”. In my view it is impossible to create access facilities across the A458 that are extensive, attractive and safe. Crossings on roundabouts are not safe and a footbridge presents numerous social issues. Development to the south of the A458 would create a separate community from Bridgnorth contrary to policies SP1 1(a); 1(b); and 1(c). BRD030 is therefore an unsound part of the plan.
4. Para 5.56 does not acknowledge that siting the development at Tasley (rather than Stanmore) will substantially increase traffic volumes through Bridgnorth Low Town as the majority of residents are likely to commute to Stanmore Business Park, Telford or Wolverhampton. In addition siting of TGV to the south of the A458 will necessitate vehicle use into Bridgnorth. The development therefore will increase vehicle usage, cause congestion and is contrary to policy SP1 1c. “Addresses and mitigates the impacts of climate change”. BRD 030 is therefore an unsound part of the plan,
5. Para 5.56 (and S3.1 (1)) omits to refer to the damage to the landscape that would be created by the TGV. The evidence document “Summary of the Assessment of Garden Village Proposals in Bridgnorth” states that the landscape of the development site is more sensitive to employment than Stanmore but the impact can be mitigated by site design and development type”. In fact the site is situated on high ground sloping south. The setting looking north for the approaches and residents on the Ludlow Road, Telegraph Lane, Cross Houses, Underton and The Lye will be destroyed. It would not be possible to mitigate the impact due to the topography. The development would therefore be a significant scar on the landscape for those approaching Bridgnorth from Ludlow. TGV therefore contravenes policy SP1 1d. “Conserves and enhances the high-quality natural environment”. The development should be removed from the Local Plan as it contravenes Council strategic policies and is unsound.
6. Para 5.56 (and S3.1(1)) does not provide any recognition of the Conservation Area at Brigdwalton managed by Shropshire Wildlife Trust. The proximity of this site would prevent any practical mitigation and therefore indicates that the inclusion of BRD030 in the plan is unsound.

(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.

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	Part B Reference:

BRD030 should be removed from the place plan and that part of S3.1(1) and para 5.56 deleted. The proposal for development at Stanmore as previously considered by the Council offers a reasonable alternative which already has the backing of Bridgnorth Town Council.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: T. Morris

Date: 26/02/2021

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Part A Reference:

Part B Reference: