

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:	Click or tap here to enter text.
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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"/>	Policy:	<input type="text" value="DP18 & S3"/>	Site:	<input type="text" value="BRD030"/>	Policies Map:	<input type="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.

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Livestock Market:

When the SAMDev Plan for 500 dwellings in Tasley was approved, Shropshire Council insisted that the Livestock Market be re-located as it was felt that the market was incompatible with housing. Now, under the Local Plan, the proposed TGV will surround the Livestock Market on three sides.

Poultry Units:

Schedule S3.1(1) states that 'Before occupation of the first dwelling on the site, any poultry units operating on the site or land within the wider site promotion will cease operation.'

In a Shropshire Council Cabinet Report entitled 'Shropshire Local Plan Review: Pre Submission Draft dated 20 July 2020, Appendix 2: Summary of the Assessment of Garden Village Proposals in Bridgnorth stated at paragraph 34: "The land at the 'Garden Village' at Tasley contains the site of a current Planning Application for Poultry Units. It is understood that if the site is allocated then these Poultry Units would not be implemented."

These two statements are not compatible. Furthermore, at the Council Cabinet meeting which discussed the Regulation 18 proposals, Council officers referred to a possible legal agreement which would prevent houses being built if the

poultry farm was operating. Currently no such agreement has been registered.

It is quite possible therefore that the TGV would be built in the vicinity of both the livestock market and the poultry farm.

In DP18. Pollution and Public Amenity it is stated at 4.168 that 'Developments such as intensive livestock units may need a Habitat Regulation Assessment...'

In Appendix 2 of the Shropshire Council Cabinet Report entitled 'Shropshire Local Plan Review: Pre Submission Draft dated 20 July 2020, it is stated at paragraph 35:

'The land at the 'Garden Village' at Tasley is also close to sources of current road and commercial noise and potential future noise and odour from the relocated livestock marketother commercial uses on the existing employment allocation and potential commercial uses on the employment land proposed ... this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering.'

No details are given as to how this can be achieved or how long it takes for the measures to be effective. No mention is made of the potential noise and odour from the poultry units.

(How can odour from the poultry units and livestock market be mitigated?)

(Please continue on a separate sheet if necessary)

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1. Having insisted that the Livestock market be moved from its current location as it was felt that the market was incompatible with housing, an explanation is required as to why the Council is allowing the TGV to be built alongside it?
2. Is there a legal agreement in place between the landowner who has submitted the planning application for the poultry units and the Council? If so, why is it not available to the public? If not, how will the Council ensure that the poultry units are not in use once the TGV development has started?
3. Details are required as to how noise and odour can be mitigated in these circumstances.

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

Yes, I wish to participate in hearing session(s)

Office Use Only	Part A Reference:
	Part B Reference:

(Please tick one box)

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Employment Land:

The Local Plan confirms that, as agreed in the SAMDev Plan 2015, **6.6 ha** (the equivalent of just over 12 full sized football pitches) of land south of the A458 has been approved for the re-location of the Livestock Market together with its existing or alternative ancillary uses. In addition, a further **6.7 ha** adjoining the area reserved for the Livestock Market has been approved for a business park for Class B uses (ie for offices, research and development, industrial processes and warehousing for storage or distribution).

In addition, the TGV site will include a further 16 ha of employment land also for Class B uses.

In total **29 ha of employment land** (the equivalent of just over 54 full sized football pitches) has been allocated to the Tasley area south of the A458, all of which is outside the Bridgnorth Development Boundary and is significantly larger than the current Stanmore Business Park which covers just over 17 ha in area.

As well as setting out the above for employment land the Local Plan has identified a further **11 ha of Green Belt** land to allow for the extension of the current Stanmore Business Park size.

Altogether the Local Plan has earmarked a total of **40 ha** for employment land in the Bridgnorth area.

Telford is approximately 15 minutes from Bridgnorth, has land available, is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future funding being made available for improvements.

There is evidence of a lack of demand for employment land as only 10% of available land in Bridgnorth has been developed since the year 2000. On what grounds does Shropshire Council believe that there is a requirement for 40 ha for offices, research and development, industrial processes and warehousing for storage or distribution?

Are all the units currently available for occupation by businesses in Bridgnorth and surrounding areas occupied? What is the vacancy rate?

How has Covid19 affected or will affect current businesses?

On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?

(Please continue on a separate sheet if necessary)

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1. Shropshire Council should provide the following for discussion:

What areas / units are already available for occupation but vacant and how long they have been vacant?

Evidence that the predicted levels of employment growth are achievable particularly in the light of Covid 19.

Evidence that there is a requirement for a further 27 ha of employment land in addition to that agreed in the SAMDev Plan 2015.

2. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?

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

Paragraph:	<input type="text"/>	Policy:	DP17, DP18 & S3	Site:	BRD030	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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Landscape and Visual Amenity:

DP 17 of the Pre-Submission Draft states:

1. Development proposals should respect, safeguard, and wherever possible, restore or enhance landscape character and visual amenity in Shropshire.
2. All major development proposals and developments which are likely to generate significant effects as a result of the presence of highly sensitive landscape and visual receptors and/or high magnitude of effect, must be accompanied by an appropriate and proportionate assessment of landscape and visual impacts, unless it is agreed by the Council that this is not necessary. The assessment of landscape and visual impacts must follow industry good practice, be carried out by a suitably qualified and experienced landscape professional and be sufficient to determine the significance of predicted effects on landscape character, landscape elements and visual amenity.

In a Shropshire Council Cabinet Report entitled 'Shropshire Local Plan Review: Pre Submission Draft dated 20 July 2020, Appendix 2: Summary of the Assessment of Garden Village Proposals in Bridgnorth it was stated at paragraph 19 that:

"The land at the 'Garden Village' at Tasley is primarily located within a landscape parcel assessed as having medium landscape and visual sensitivity to housing and medium-high landscape and visual sensitivity to employment."

Pollution and Public Amenity:

DP 18 of the Pre-Submission Draft states:

"4. Development should avoid Shropshire's best and most versatile agricultural land (grades 1, 2 and 3a) wherever possible,

7. When development may create additional noise, during construction or operation, or when new development would be sensitive to the existing noise environment (including any anticipated changes to that environment from activities that are permitted but not yet commenced) proposals should include a noise assessment

8. The noise assessment should be prepared by an experienced specialist and follow industry good practice ..."

In Appendix 2: Summary of the Assessment of Garden Village Proposals in Bridgnorth it was stated at paragraph 35:

"The land at the 'Garden Village' at Tasley is also close to sources of current road and commercial noise and potential future noise and odour from the relocated livestock market, other commercial uses on the existing employment allocation and potential commercial uses on the employment land proposed within the site promotion itself. These issues would require careful and sensitive consideration; however, it is considered that this can be appropriately managed ..."

The Pre-Submission Draft also states:

4.167. There are two Air Quality Management Areas (AQMA) in Shropshire, in Shrewsbury and Bridgnorth. Both are within the urban area where air pollution results mainly from traffic. Air quality will be considered when assessing development proposals, particularly in or near the AQMAs and where significant doubt arises as to the air quality impact then a cautious approach will be applied.

4.171. Background levels of ammonia in the air and nitrogen loads deposited on natural habitats are generally well above the levels and loads recognised as causing damage throughout Shropshire.

Ecology:

Appendix 2: Summary of the Assessment of Garden Village Proposals in Bridgnorth states that:

"22. The land at the 'Garden Village' at Tasley is located within the Impact Risk Zone for four SSSIs risks can be managed through appropriate design, layout and construction of the development.

23. It also includes areas within environmental networks and could contain protected species and priority habitats...."

(Please continue on a separate sheet if necessary)

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	Part B Reference:

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1. Has an assessment of landscape and visual impacts been carried out by a suitably qualified and experienced landscape professional? If so, why has it not been published? If not, why?
2. The land on which the proposed TGV is to be built is classified as Grade 3 agricultural land. At a time when local food production in the UK is under threat, why is Grade 3 agricultural land being taken for residential and employment facilities?
3. With the introduction of more vehicles on the A458 has a noise assessment been prepared by an experienced specialist? If so, why has it not been published? If not, why?
4. Tasley will be the site for 2,250 additional dwellings and 29 ha of employment land. This will bring a substantial increase in vehicle movement. What measures will be taken to improve the air quality in and around Bridgnorth?
5. How can noise and odour be mitigated successfully?
6. Both the Council for Protection of Rural England (CPRE) and Shropshire Wildlife Trust (SWT) have objected to the Tasley development. How does Shropshire Council justify pursuing the TGV development knowing the ecological damage it will cause to the area? What measures will be put in place to safeguard the SSSIs and the environmental networks?

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Part A Reference:

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

Paragraph:	<input type="text"/>	Policy:	SP14, DP25 & S3	Site:	BRD030	Policies Map:	<input type="text"/>
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Infrastructure:

Roads and Highways:

The only transport plan available at the moment is Shropshire Council's Local Transport Plan 2011-2026. Although the Council have now commissioned a new review this should have been carried out prior to any decision was made about the Local Plan. Roads and highways are always going to be fundamental to the decision making process and any decision should be underpinned by a strong evidence base. As a consequence it has to be assumed that the Local Transport Plan 2011-2026 was used as the basis for any decisions.

As acknowledged by Shropshire Council there are topographical and landscape restraints within Bridgnorth and its surrounding areas which severely restrict development and road improvements: the town is bisected by the River Severn, there are only two bridges across the river in the Bridgnorth area which are accessible to vehicles thus creating natural pinch points, High Town sits on an escarpment as does the A442 to Telford. In addition the A roads to Telford, Wolverhampton, Stourbridge, Kidderminster and Shrewsbury are mainly single, winding carriageways and therefore slow.

A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils was asked in June 2019 to consider the issues facing Bridgnorth and to develop a plan for the settlement. Their draft report which was published in May 2020, states that:

“Existing local infrastructure, transport links, public facilities and services are not capable of supporting much growth in population and business activity without significant investment.”

The Local Transport Plan 2011-2026 confirms this view:

“Section 2.2:

Shropshire has a few key trunk and principal roads which provide links between the major settlements, predominantly in the form of single carriageway roads.

Section 4.6.3:

..... slow moving vehicles can be a cause of journey delay.

Historic road networks not designed to take today’s traffic levels can become congested with relatively low traffic levels and as traffic levels grow congestion may spread to more parts of the road network.”

Approximately 60% of people in Bridgnorth travel to work outside Bridgnorth mainly to Telford, Wolverhampton and Kidderminster and a similar percentage of jobs in Bridgnorth are filled by travelling in to the town. This is unlikely to change.

The proposed sites at Tasley are taking residential development away from the main employment areas of the town and the region (ie Stanmore, Wolverhampton and Telford). Whilst some employment is to be provided on site the majority of the residents in Bridgnorth and surrounding areas will continue to travel to work at Stanmore, Wolverhampton and Telford. Some of those who choose to live in the proposed new residential areas will take up employment in the new settlements but many will choose to travel to the larger, better paid jobs on offer in the West Midlands. Many of those who choose to work in the proposed new settlements will be travelling into the area from where they already live.

Shropshire Council’s Local Transport Plan 2011- 2026 acknowledges this trend:

“Section 2.3:

A significant proportion of high skilled, and better paid, workers commute out of Shropshire to work. Indicating that Shropshire is an attractive place for highly paid workers in Telford and other neighbouring areas to live.

Section 2.4:

Shropshire is also likely to be increasingly influenced by Telford which is expected to grow its population, housing and employment at even more rapid rates than Shropshire.”

The proposed developments at Tasley are for a total of 2,250 dwellings which, at a conservative estimate, will increase the population of Bridgnorth by 4,500 people. Assuming a minimum of one car per dwelling, (again a conservative estimate), these developments will put at least **2,250 additional vehicles** onto roads which the Council admits are inadequate. In addition, the proposed employment land in Tasley will increase the number of vehicles coming in and out of Bridgnorth, many of which will be large vehicles supplying or working from the B class units proposed for these areas (ie research and development, industrial processes and warehousing for storage or distribution).

TW’s own transport review states that 75% of peak hour traffic from their site (which therefore does not include the development north of the A458) will travel east on the A458 bypass to Telford, Wolverhampton, Stourbridge and Kidderminster.

Good road communications are vital for any community to prosper yet there has been no significant improvement to the road networks around Bridgnorth for more than 20 years and public transport is in decline. The roads to neighbouring towns all have pinch points that limit the maximum traffic flow. Currently Shropshire Council has no plans to make any strategic investments in the road network around Bridgnorth yet they are proposing to increase the amount of traffic on these roads significantly.

The additional traffic and 35% increase in population will adversely affect those wishing to move into the Bridgnorth area as it would be no longer “an attractive place for highly paid workers in Telford and other neighbouring areas to live.”

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	Part B Reference:

The Council's Local Transport Plan 2011- 2026 was aware of this danger as it states:

“Section 2.7:

While connectivity is important to economic success, so is a high quality of life.

The remoteness of Shropshire is one of the factors which contributes to its attraction as an unspoilt and tranquil place to live, work and visit. This is a particularly important factor in attracting higher skilled workers and businesses. It is important therefore to ensure that the environmental assets of the county are not damaged when seeking to improve connectivity and accessibility.”

Why would SMEs choose to move or set up in Bridgnorth when the road links to and from Bridgnorth are poor and access to the motorways is slow?

How will the proposals encourage ‘highly paid workers’ to move to Bridgnorth and what evidence is there that this will happen?

A458 and Access for Pedestrians and Cyclists:

The A458 is a busy road and crossing from the proposed TGV development to the new development north of the A458, and to Bridgnorth, would be dangerous. TW has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but TW does not own the land or control the majority of the land fronting the A458 and are unlikely to do so in the foreseeable future.

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1. What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas?
2. As there are no plans to improve the roads, the likelihood of meeting the stated employment targets is poor and will remain so until improvements are made. Any such improvements need to have been carried out, or, at the very least, definite plans and investments should be in place if SME's are to be encouraged to move into the Bridgnorth area.
3. Clarification is required as to whether or not TW will own, or have options to purchase the land required for a footbridge to be built and if so how they intend to do this?
4. If it is not possible to purchase the necessary land how will TW ensure that safe access across the A458 is possible?

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

Paragraph: Policy: Site: Policies Map:

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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Schedule S3.1(1) states that Tasley Garden Village will be a "comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village'.

Principles of Garden Village Developments:

The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages based on the work of Sir Ebenezer Howard who set out guidelines and principles for the development of garden cities and whose work led to the modern planning profession and planning system. His three main principles, adopted by the TCPA, are:

1. Land value capture for the benefit of the community.
2. Strong vision, leadership and community engagement.
3. Community ownership of land and long-term stewardship of assets.

A report from Transport for New Homes entitled 'Garden Villages and Garden Towns: Vision and Realty', having reviewed more than 30 developments designated as 'Garden Villages' or 'Garden Towns', found that nearly all the developments produced car based housing and increased traffic generation. They also found that the majority of the

developments were in the wrong location, particularly for sustainable modes of transport. The report concludes that "We need housing but we need to build in the right place and in the right way. Housing numbers and targets are not everything".

The size and location of the proposed TGV is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.

(Please continue on a separate sheet if necessary)

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1. In their 'Development Statement' TW mention these three principles but do not say how they and the landowners intend to meet them. Shropshire Council should insist that TW formally sign up to these principles and set out in detail how they intend to meet them?
2. Shropshire Council should set out how they will monitor the development and ensure that TW adhere to the three principles?

(Please continue on a separate sheet if necessary)

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- 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:

Office Use Only	Part A Reference:
	Part B Reference:

(Please continue on a separate sheet if necessary)

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Signature:

Date:

01/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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:	Click or tap here to enter text.
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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: Policy: Site: Policies Map:

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The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan states the following at Section S3.1:

“S3.1 Development Strategy: Bridgnorth Principal Centre

- Bridgnorth will fulfil its role as the second largest Principal Centre and contribute towards strategic growth objectives in the east of the County, delivering around 1,800 dwellings and making available around 49ha of employment land to create choice and competition in the market. 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.
-
-
- New residential development will also be delivered through the saved SAM Dev mixed use and residential allocations; ...”

Comments:

The Local Plan has identified an area south of the A458 for a development of **1,050 dwellings** to be built by Taylor Wimpey (TW) during the period 2020 - 2038. This has been designated as Tasley Garden Village (TGV).

The Local Plan has also earmarked an additional area west of the proposed TGV, towards Morville, for future

development after 2038. TW state in their 'Development Statement, that up to **700 dwellings** could be built on this land.

In addition, as part of the Shropshire Council's Site Allocations and Management of Development (SAMDev) Plan, which was adopted in 2015, it was agreed that **500 dwellings** would be built in Tasley north of the A 458 in the area of the Livestock Market and northwards. This development has not yet started.

Therefore, in total, the Local Plan is recommending that **2,250 new dwellings** be built in the Tasley area.

As of 2020, the population of Bridgnorth is approximately 13,000. If it is assumed that there will be only two residents per new dwelling, (which is probably a very conservative figure), it will increase the population of Bridgnorth by **4,500 people** which represents an increase of **35%**.

On what basis has Shropshire Council arrived at the larger figure?

Whilst it is accepted that Bridgnorth and surrounding areas require more dwellings to cater for the likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for **the needs of the town** and surrounding hinterland...?'

As a **Local Housing Needs Assessment** has not been carried out to establish what the needs of Bridgnorth are, where is the evidence that 2,250 dwellings and an increase in population of a minimum of 35% meet the needs of the town?

What evidence is there that the town can support an increase of 35% to its population?

(Please continue on a separate sheet if necessary)

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1. Commission a Local Housing Needs Assessment for Bridgnorth to establish the actual needs of the town and surrounding areas. This assessment should be reviewed every five years.
2. Provide evidence that Bridgnorth can sustain an increase in its population of at least 35%.

(Please continue on a separate sheet if necessary)

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Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Part B: Representation

Name and Organisation:	
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It is acknowledged that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However, it should be noted that consultation on the two main development proposals for Bridgnorth, at Tasley and Stanmore, has taken place through different mechanisms. The late emergence of the Tasley Garden Village proposal was limited to online consultation only due to the Covid 19 pandemic with no option for the public to examine the plans in person or discuss them at exhibitions and meetings.

A substantial number of objections to the Bridgnorth Place Plan were made to Shropshire Council through the Regulation 18 consultation including objections from the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils. Despite this, it would appear that no account has been taken of these views and no public explanation has been given as to why the views expressed have been ignored.

A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils was formed in June 2019 to consider the issues facing Bridgnorth and to develop a plan for the settlement. Their draft report was published in May 2020, around the same time that the Tasley Garden Village proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.

(Please continue on a separate sheet if necessary)

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1. Provide an explanation as to why the views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.
2. Delay any decision on the Legal Compliance and Soundness of the Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.

(Please continue on a separate sheet if necessary)

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