

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.

Pai	rt B: Represei	ntation					
Na	ame and Organisation:	Lady Bridget Cash					
Q1.	To which documen	t does this representation relate?					
$\overline{\mathbf{V}}$	Regulation 19: Pre-Su	bmission Draft of the Shropshire Local Plan					
	Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire					
	Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the					
Q2.	To which part of th	e document does this representation relate?					
Parag	graph:	Policy: S3 Site: BRD030 Policies Map:					
_	Do you consider th opshire Local Plan	e Regulation 19: Pre-Submission Draft of the is:					
A.	Legally compliant	Yes: No:					
В.	Sound	Yes: No: 🗹					
	Compliant with the Dut	<u> </u>					
Dra fails If you of the set of	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. It is acknowledged that community involvement, as set out in the Council's Statement of Community Involvement						
(SCI) proposed of the option A sur Regular Count views A stellar June public public control of the control of the country of t	h, has taken place to a limited peals for Bridgnorth, at Tasley at Tasley Garden Village propent for the public to examine the bestantial number of objection lation 18 consultation included and the surrounding Parisms and no public explanation has ering group consisting of mer 2019 to consider the issues as shed in May 2020, around the	degree. However, it should be noted that consultation on the two main development of and Stanmore, has taken place through different mechanisms. The late emergence osal was limited to online consultation only due to the Covid 19 pandemic with note plans in person or discuss them at exhibitions and meetings. Instanto the Bridgnorth Place Plan were made to Shropshire Council through the ling objections from the elected Shropshire Councillors for the area, the Town the Councils. Despite this, it would appear that no account has been taken of these as been given as to why the views expressed have been ignored. In the Bridgnorth Town Council and surrounding Parish Councils was formed in facing Bridgnorth and to develop a plan for the settlement. Their draft report was the same time that the Tasley Garden Village proposal came to light. However this insidered by Shropshire Council at all.					

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.

	an explanation as to why the		<u> </u>	
and the	surrounding Parish Councils	have been ignored.		
	ny decision on the Legal Cor ess have been resolved and ar			
Soundii	ess have been resorved and ar	ry alternative options have t	cen considered in detain.	
		(Please c	ontinue on a separa	te sheet if necessary)
	te: In your representat			
	i information necessary on(s). You should not a		•	
submission		ssame that you will he	ive a further opport	unity to make
After this	stage, further submi	issions may only be	made if invited by	the Inspector,
	the matters and issu			
O6 If vo	our representation i	s seeking a modifi	cation to the Re	gulation 19: Pro-
_	ion Draft of the Shr	_		_
	ite in examination l	-	•	•
	e that while this will pro			
	, you may be asked at a	•		rticipate.
✓ No,	I do not wish to partici	pate in hearing sessio	n(s)	
Yes	, I wish to participate ir	n hearing session(s)		
(PI	ease tick one box)			
Q7. If yo	u wish to participa	te in the hearing s	ession(s), pleas	e outline why
you cons	sider this to be nece	essary:		
<u> </u>		(Dlanes and	tim	
Diezse not	te: The Inspector will de	•	•	sheet if necessary)
	have indicated that they			
	our wish to participate	when the Inspector ha	as identified the ma	tters and issues for
examinatio	า. 			
Signature:	Lady Bridget Cash		Date:	24/02/2021
orginature.	Lady Diraget Casil		Date.	21/02/2021
		Office Use Only	Part A Reference	e:
		Office Use Only	Part B Reference	re:



Representation Form

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Part B: Represe	ntati	on					
Name and Organisation:	Lady	Bridget Cash					
Q1. To which docume	nt does	this repre	sentatio	on relate?			
Regulation 19: Pre-S	ubmissio	n Draft of the	Shropsh	nire Local Plai	n		
Sustainability Apprai	sal of the	Regulation 1	9: Pre-S	ubmission Dr	aft of t	the Shr	opshire
Habitats Regulations Shropshire Local Plan (Please tick one box)	ent of the Re	gulation	19: Pre-Subr	nissior	Draft	of the
Q2. To which part of t	he doc	ument does	s this re	epresentati	ion re	late?	
Paragraph:	Policy:	SP2 & S3	Site:	BRD030	P	olicies Map:	
Q3. Do you consider to Shropshire Local Plan	_	ulation 19:	Pre-Su	bmission D	Praft (of the	
A. Legally compliant			Yes:		No:		
B. Sound			Yes:		No:	\checkmark	
C. Compliant with the Du	ty to Co-	-operate	Yes:		No:		
(Please tick as appropri	ate).						
Q4. Please give detail Draft of the Shropshir fails to comply with the If you wish to support the least	e Local ne duty	Plan is not to co-oper	t legally ate. Ple	y complian ease be as	t or is precis	unso se as	ound or possible.
of the Shropshire Local Plan set out your comments.							
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 1. 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.							
4. New residential development tions;"	will also b	e delivered throu	igh the sav	red SAM Dev m	ixed use	and resi	dential alloca-
Comments: The Local Plan has identified an Wimpey (TW) during the period			-		_		• •
The Local Plan has also earma	rked an ac	lditional area w	est of the	proposed TGV.	toward	ls Morvi	lle, 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 sur-
	rounding areas. This assessment should be reviewed every five years.

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2	Z. P	rovi	ne .	evic	ience	tha	t Bi	r1d	gnorti	ı can	sustain	an	increase	ın	1 t S 1	nonu	latic	n o	r at	least	337	'n.

(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.

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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)?

Office Use Only	Part A Reference:
Office use Offiy	Part B Reference:

	note that while this will provide an initial indication on (s), you may be asked at a later point to confirm yo		
$\overline{\checkmark}$	No, I do not wish to participate in hearing session(s)		
	Yes, I wish to participate in hearing session(s)		
_	(Please tick one box)		
	f you wish to participate in the hearing sess onsider this to be necessary:	sion(s), pleas	e outline why
those w	note: The Inspector will determine the most approp tho have indicated that they wish to participate in hear rm your wish to participate when the Inspector has in	riate procedure aring session(s).	You may be asked
Signatu	re: Lady Bridget Cash	Date:	24/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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maki	ng checuve representa	cions.							
Par	t B: Represe	ntation							
Na	nme and Organisation:	Lady Bridget Cash							
Q1.	To which documer	nt does this repre	sentation re	elate?					
$\overline{\mathbf{V}}$	Regulation 19: Pre-Su	bmission Draft of th	e Shropshire L	ocal Plan					
	Sustainability Apprais Local Plan	al of the Regulation	19: Pre-Submi	ssion Draft of the	Shropshire				
	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		s this repre	sentation relat	e?				
Parag	graph:	Policy: S3	Site: BR	D030 Polic	ies ap:				
_	Do you consider thopshire Local Plan	_	Pre-Submi	ssion Draft of t	the				
A.	Legally compliant		Yes:	No:]				
В.	Sound		Yes:	No: 🗸	1				
	Compliant with the Dut		Yes:	No:]				
Dra fails If yo of th	Please give details ft of the Shropshire to comply with the u wish to support the lege Shropshire Local Plant your comments.	e Local Plan is no e duty to co-oper gal compliance or sou	ot legally con rate. Please ndness of the F	mpliant or is un te be as precise Regulation 19: Pre-	nsound or as possible. Submission Draft				
	lule S3.1(1) states that Tasle lopment will comply with the			e mixed-use sustainab	le urban extension.				
Prince The Transfer of garden	ciples of Garden Village Dev Fown and Country Planning on Villages based on the work rden cities and whose work led ed by the TCPA, are:	velopments: Association (TCPA) has k of Sir Ebenezer Howard	produced a num	elines and principles for	or the development				

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

Land value capture for the benefit of the community.
 Strong vision, leadership and community engagement.

Community ownership of land and long-term stewardship of assets.

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
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.
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 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? 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
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)?
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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: Part A Reference:

Office Use Only

Part B Reference:

(Please continue Please note: The Inspector will determine the most appropriate who have indicated that they wish to participate in heat to confirm your wish to participate when the Inspector has it examination.	riate procedure aring session(s).	You may be asked
Signature: Lady Bridget Cash	Date:	24/02/2021



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Par	t B:	Represer	ıtati	on					
Nar	me an	d Organisation:	Lady 1	Bridget Cash					
Q1.	To w	hich documen	t does	this repres	entatio	on relate?			
\checkmark	Regul	ation 19: Pre-Sul	omissio	n Draft of the	Shropsh	nire Local Plan	n		
	Susta Local	inability Appraisa Plan	l of the	Regulation 19	9: Pre-S	ubmission Dr	aft of	the Shr	opshire
	Shrop	ats Regulations A shire Local Plan ase tick one box)	ssessm	ent of the Reg	gulation	19: Pre-Subr	nissior	Draft o	of the
Q2.	To w	hich part of th	e docı	ument does	this re	presentati	ion re	late?	
Paragr	aph:		Policy:	SP12 & S3	Site:	BRD030	P	olicies Map:	
_	_	ou consider the	_	ulation 19:	Pre-Su	bmission D	Praft (of the	
A. L	egally	compliant			Yes:		No:		
В. 5	Sound				Yes:		No:	$\overline{\checkmark}$	
	•	ant with the Duty		operate	Yes:		No:		
Draffails If you of the set ou	t of t to co wish Shrop It your	e give details he Shropshire omply with the to support the legion of comments.	Local duty al comp	Plan is not to co-opera	legally ate. Ple dness of	compliant case be as the Regulation	t or is precis	s unso se as p Pre-Subi	und or possible. mission Draft
The Lo footbal its exis Market	ll pitche sting or t has be	Land: an confirms that, as a es) of land south of the alternative ancillary een approved for a be warehousing for stora	e A458 h uses. In isiness p	as been approved addition, a furth ark for Class B u	l for the re- ner 6.7 ha	location of the ladjoining the a	Livestoc rea rese	k Market rved for	together with the Livestock
In addi	In addition, the TGV site will include a further 16 ha of employment land also for Class B uses.								
Tasley	area so	of employment land uth of the A458, all o nt Stanmore Business	f which i	s outside the Brid	lgnorth De	velopment Bour			
As wel	ll as set	ting out the above for	emplovi	ment land the Loc	cal Plan ha	s identified a fu	rther 11	ha of Gr	een 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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	, 35
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?

(Please continue on a separate sheet if necessary)

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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.

363310	in(s), you may be asked at a later point to commit your request to participate
\checkmark	No, I do not wish to participate in hearing session(s)
	Yes, I wish to participate in hearing session(s) (Please tick one box)

Office Use Only	Part A Reference:
Office Use Only	Part B Reference:

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:				
	(Please continue	e 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:	Lady Bridget Cash	Date:	24/02/2021	

Office Use Only

Part A Reference:

Part B Reference:



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Part B: Representation				
Name and Organisation:	Lady Bridget Cash			
Q1. To which docume	nt does this representation relate?			
Regulation 19: Pre-S	Submission Draft of the Shropshire Local Plan			
Sustainability Apprais	sal of the Regulation 19: Pre-Submission Draft of the Shropshire			
Habitats Regulations Shropshire Local Plan (Please tick one box				
Q2. To which part of t	the document does this representation relate?			
Paragraph:	Policy: DP18 & Site: BRD030 Policies Map:			
Q3. Do you consider t Shropshire Local Plan	the Regulation 19: Pre-Submission Draft of the is:			
A. Legally compliant	Yes: No:			
B. Sound	Yes: No: 🗹			
C. Compliant with the Du	uty to Co-operate Yes: No: No:			
(Please tick as appropri				
Draft of the Shropshin fails to comply with the If you wish to support the Is	Is of why you consider the Regulation 19: Pre-Submistre Local Plan is not legally compliant or is unsound or the duty to co-operate. Please be as precise as possible and compliance or soundness of the Regulation 19: Pre-Submission or its compliance with the duty to co-operate, please also use this because the control of the compliance with the duty to co-operate, please also use this because the control of t	r le. Draft		
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 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) 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. 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. (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,

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$\overline{\mathbf{V}}$	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:
Office Use Only	Part B Reference:

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`	ease tick one box)	sion(s) plans	o cutling why
	ou wish to participate in the hearing sess sider this to be necessary:	oion(s), pieas	se outline why
	-		
ease not	Please continu) e: The Inspector will determine the most appropa		sheet if necessary
ose who h	have indicated that they wish to participate in hea	aring session(s).	. You may be aske
confirm y amination	vour wish to participate when the Inspector has idn.	dentified the ma	tters and issues fo
an atura .	Ladry Daideat Cook	Data	24/02/2021
gnature:	Lady Bridget Cash	Date:	24/02/2021

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Part	B: Represe	entatio	on				
Nan	ne and Organisation	: Lady F	Bridget Cash				
Q1. T	o which docume	ent does	this repres	entatio	on relate?		
	Regulation 19: Pre-S	Submissior	n Draft of the	Shropsh	nire Local Plar	1	
	Sustainability Appra Local Plan	isal of the	Regulation 19	9: Pre-S	ubmission Dr	aft of the Sh	ropshire
	Habitats Regulations Shropshire Local Pla (Please tick one bo	n	ent of the Reg	gulation	19: Pre-Subn	nission Draft	of the
Q2. T	o which part of	the docu	ıment does	this re	presentati	on relate?	
Paragra	aph:	Policy:	SP14, DP25 & S3	Site:	BRD030	Policies Map:	
_	Do you consider t pshire Local Plat	_	ılation 19:	Pre-Su	bmission D	raft of the	
A. Le	egally compliant			Yes:		No:	
B. S	ound			Yes:		No: 🗹	
	ompliant with the D ease tick as appropr	•	operate	Yes:		No:	
Draft	Please give detai t of the Shropshi to comply with t	re Local	Plan is not	legally	/ compliant	t or is unse	ound or
of the	wish to support the l Shropshire Local Plant t your comments.						
Roads	ructure: and Highways:	e at the mor	nent is Shranshi	re Counci	l's Local Transn	ort Plan 2011	2026 Although

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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Office Use Only	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.

(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. 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?

(Please continue on a separate sheet if necessary)

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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.

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	Part B Reference:

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(Please tick one box)				
	ou wish to participate in the hearing sess nsider this to be necessary:	sion(s), pleas	e outline why		
	(Please continu	e 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	: Lady Bridget Cash	Date:	24/02/2021		

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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.

Pa	Part B: Representation								
ľ	Name and Organisation:	Lady I	Bridget Cash						
Q1	Q1. To which document does this representation relate?								
$\overline{\mathbf{V}}$	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 A Shropshire Local Plan (Please tick one box)		ent of the Reg	gulation :	19: Pre-Subn	nission Draft	of the		
Q2	2. To which part of th	e docı	ıment does	this re	presentati	on relate?			
Para	agraph:	Policy:	SP13, DP25, DP27, DP28 & S3	Site:	BRD030	Policies Map:			
	Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:								
	. Legally compliant	_		Yes:		No:			
В	. Sound			Yes:		No: 🔽			
	. Compliant with the Duty (Please tick as appropriat	•	operate	Yes:		No:			

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.

The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan states at DP 25. Infrastructure Provision:

"1. New development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution,"

Broadband and Mobile Communications Infrastructure:

The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan states at DP 27. Broadband and Mobile Communications Infrastructure:

- 1. Shropshire businesses and communities require quality broadband provision and mobile network connectivity to support economic growth, social inclusion and community safety.
- 2. Development proposals will be expected to provide the infrastructure for broadband and mobile communications as essential utilities.

The Pre-Submission Draft then goes on to say at paragraph 4.244:

"All new developments will be expected to conform to the Government's evolving ambition for 'gigabit-capable' broadband infrastructure to be available to all premises in the UK by 2025. As of March 2020, 6.5% of properties in Shropshire had access to full-fibre connections (12.4% in the UK)."

Communications and Transport:

At DP 28 the Pre-Submission Draft states:

- Shropshire will continue to be an attractive place to live and work by improving its communications and transport networks and supporting the infrastructure and services to widen travel and transport choices and to improve connectivity and accessibility whilst moving towards reduced car dependency and manage the impacts of transport movements on communities and our environment.
- 2. Responding positively to changes in our climate will require access to better communications infrastructure and more sustainable travel options offering choices about the need to travel and the best transport modes.

It goes on to explain:

- 4.247. Shropshire will continue to promote and support improvements to the communications and transport infrastructure serving the County. This is central to the delivery of sustainable economic growth and the creation of sustainable patterns of development in the settlements, 'strategic corridors' and 'strategic sites' of the County.
- 4.250. This process of managing change starts with the decision whether we need to travel at all. The most sustainable travel option is to access work, goods, services, leisure and social interaction remotely using electronic communication media or to achieve key elements of these activities in this way, as our first choice, irrespective of age or technological ability. The response to the Coronavirus restrictions shows how we might respond positively to the effects of global challenges on our lives and realise tangible benefits for ourselves and our local, national and global communities.
- 4.251. This will require the delivery of infrastructure for broadband, mobile and fixed wireless networks to remove the need to travel.
- 4.253. Local travel options play an essential role in influencing travel behaviour including footways, cycleways
- 4.254. Passenger transport services reduce the cumulative effects of individual travel choices by helping to lower congestion, improve air quality and mitigate other impacts. The Local Transport Plan identifies public transport networks and service improvements and seeks to supports less accessible communities. The extension of community transport networks, the maintenance of Park & Ride and local rail improvements are also encouraged."

However it should be noted that Shropshire Council's Local Transport Plan 2011-2026 states at Section 2.2:

"The provision of a comprehensive bus service in Shropshire is challenging.

Most local bus services rely on financial support from the Council with only a small number of services run on a commercial basis;"

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
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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.

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Communications:

- 1. What 'developer contribution' has TW agreed to make to improve the infrastructure which is clearly insufficient? Is the 'developer contribution' sufficient to cover the required improvements to the infrastructure? If there is a shortfall will Shropshire Council meet the difference?
- 2. What are the plans for ensuring that broadband throughout the County, and in Bridgnorth in particular, will be comparable with the rest of the UK?
- 3. New businesses are unlikely to want to move into Bridgnorth if the broadband and mobile communications are inadequate? What guarantees do any potential employers have that the required broadband and mobile communications will be available by the time they move into their new premises?

Transport Networks:

- 4. Where will these 'parking facilities' and 'dedicated park and ride service' be located as it is not mentioned in the TW proposal? How will these facilities be integrated with the needs of the development north of the A458?
- 5. Shropshire Council acknowledges that 'most local bus services rely on financial support from the Council'. How will a usable, regular bus service from the TGV to the town centre be funded? Will the Council guarantee that they will continue to support the local bus services?

(Please continue on a separate sheet if necessary)

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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)?

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$\overline{\mathbf{V}}$	No, I do not wish to participate in hearing session(s)
	Yes, I wish to participate in hearing session(s) (Please tick one box)
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(Please continue on a separate sheet if necessary)

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	Part B Reference:

Signature:	Lady Bridget Cash	Date:	24/02/2021
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Part A Reference:

Part B Reference:



Representation Form

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Pa	rt B: Represer	ntation					
N	ame and Organisation:	Lady Bridget Cash					
Q1	. To which documen	t does this repres	entatio	on relate?			
	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
	Sustainability Appraisa Local Plan	al of the Regulation 1	9: Pre-S	ubmission Dr	aft of	the Shi	ropshire
	Habitats Regulations A Shropshire Local Plan (Please tick one box)		gulation	19: Pre-Subn	nissior	n Draft	of the
Q2	. To which part of th	e document does	this re	presentati	on re	late?	
Para	graph:	Policy: DP17, DP18 & S3	Site:	BRD030	P	olicies Map:	
	. Do you consider th ropshire Local Plan i	_	Pre-Su	bmission D	raft (of the	
	Legally compliant		Yes:		No:		
В.	Sound		Yes:		No:	\checkmark	
	Compliant with the Dut		Yes:		No:		
Q4 Dra fail	. Please give details aft of the Shropshire is to comply with the	of why you consi Local Plan is not e duty to co-opera	: legally ate. Ple	compliant case be as	t or is preci	s unso se as	ound or possible.
of t	ou wish to support the leg he Shropshire Local Plan o out your comments.						
	dscape and Visual Amenity: 7 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.							
tl n C ti	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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Office Use Only	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 land-scape 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?

(Please continue on a separate sheet if necessary)

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\checkmark	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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Signature:	Lady Bridget Cash			Date:	24/02/2021
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		Office Use Only		Part B Reference	ce: