

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: Represen	tation
Name and Organisation:	Vicki Norman
Q1. To which document	does this representation relate?
Regulation 19: Pre-Sub	mission Draft of the Shropshire Local Plan
Sustainability Appraisal Local Plan	of the Regulation 19: Pre-Submission Draft of the Shropshire
Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pre-Submission Draft of the
Q2. To which part of the	document does this representation relate?
Paragraph: Appendix 6	olicy: S3.1 Site: STC002/P58a Policies Map: 3
-	Regulation 19: Pre-Submission Draft of the
Shropshire Local Plan is:	
A. Legally compliant	Yes: No: No:
B. Sound	Yes: No: 🗸
C. Compliant with the Duty (Please tick as appropriate)	
Q4. Please give details or Draft of the Shropshire Lails to comply with the laft you wish to support the legal	f why you consider the Regulation 19: Pre-Submission ocal Plan is not legally compliant or is unsound or duty to co-operate. Please be as precise as possible. compliance or soundness of the Regulation 19: Pre-Submission Draft its compliance with the duty to co-operate, please also use this box to
Appendix 6 indica This is not details It seems unlikely new garden villag away from the m would, if the Rev they would still b is no need for su be an inappropri	the proposed allocation of employment land in Bridgnorth contained in attes that there is a Preferred Site for Recycling and Environmental Industries. Ed, but it is very worrying. that a recycling plant would be set up on a brand-new industrial estate in a ge as proposed for Tasley. This suggests that it might be set up in a location main urban area — very possibly Stanmore. The sites proposed at Stanmore view Plan is approved, be removed from Green Belt protection. However, the surrounded by Green Belt and would be located in countryside where there can development. It is considered that such a location would, in any event, at a location for recycling activities. There is already such an operation not the re, towards Worfield, and within the Green Belt, which is the source of envi-

ronmental problems, and an intensification of that use would not be an acceptable situation.

The calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates that an "additional provision to address local circumstances" of 12 ha is needed. The precise reasons for needing this additional provision, and exactly how the figure of 12 ha has been arrived at is not given.

There is no "local circumstance" that would justify such a provision. This is evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate. If the local circumstance is so acute, these areas would have been developed/redeveloped, by now. The fact that, in the over 40 years that the Stanmore Business Park has been in operation, the existing land and buildings have never been fully developed and put to operational use, indicates that an additional 11.5 ha as the Plan proposes is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is that it will adversely affect the green belt, and act as a precedent for any similar unjustified incursions into the green belt if the 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.

Sites STC002 and P58a – allocated for employment development at Stanmore – should be deleted from the Plan. There is no requirement for an alternative site to be identified.			

(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.

Office Use Only	Part A Reference:
	Part B Reference:

	No, I do not wish to participate in hearing session(s)		
$\overline{\checkmark}$	Yes, I wish to participate in hearing session(s)		
	(Please tick one box)		
_	you wish to participate in the hearing sessi onsider this to be necessary:	on(s), please	e outline why
There has been considerable pressure placed on nearby residents to the proposed sites to accept the proposals put forward in the various drafts of the Local Plan Review, and they have not been adequately represented by locally elected Paarish and County Council official and Members. It is considered essential that the wishes of local people, who will be those most affected by the proposed development, should be heard.			
	(Please continu	e on a separate	sheet if necessary)
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Signatu	re: Vicki Norman	Date:	10/02/2021

Office Use Only

Part A Reference:

Part B Reference:



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Part B: Represer	ntation			
Name and Organisation:	Vicki Norman			
Q1. To which document	does this repre	sentation relate	?	
Regulation 19: Pre-Su	bmission Draft of th	ne Shropshire Local	Plan	
Sustainability Appraisa 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)	ssessment of the R	egulation 19: Pre-S	ubmission Draft of the	
Q2. To which part of the	document does	s this representa	ition relate?	
Paragraph: P	olicy: S3.1	Site: STC002/P	Policies Map:	
Q3. Do you consider the Shropshire Local Plan is		Pre-Submission	Draft of the	
A. Legally compliant		Yes:	No:	
B. Sound		Yes:	No: 🗸	
C. Compliant with the Dut	•	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 lega of the Shropshire Local Plan or set out your comments.	l compliance or sour	ndness of the Regulat	tion 19: Pre-Submission Draft	
The proposed employment allocations at Stanmore are presented in the Local Plan Review as being necessary to serve the needs of Bridgnorth, and the Stanmore area is presented as being part of Bridgnorth town. This is not the case. The Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment. It is located in open countryside and does not form a natural extension to Bridgnorth.				
The Local Plan Review Policy S3.1 indicates that the Bridgnorth area will deliver 1,800 houses and 49 ha of employment land in Bridgnorth. The Strategic Land Supply 2016 – 2038 set out in Appendix 6: Employment Development Guidelines and Employment Land Supply, however, indicates that a total of 40.5 ha of land is to be allocated in the Place Plan Area, with only 37.7 ha to be provided in Bridgnorth. Clearly there is a discrepancy in the figures. The Local				

Plan does not explain why it is necessary to allocate 49 ha of employment land in Bridgnorth.

. ,		unt of development proposed for employment igures support this allocation.
		d, and has not been prepared on the basis of rements and take-ups of employment or em-
Regulation 19: Pre-Submissi	ication(s) you cor ion Draft of the Sh	ontinue on a separate sheet if necessary) Isider necessary to make the Iropshire Local Plan legally Iompliance or soundness matters
you have identified at Q4 ab Please note that non-compliance wit examination. You will need to say will	ove. The duty to co-operate the duty to co-operate the duty to co-operate the duty to co-operate the duty th	<u> </u>
	d for employment dev	velopment at Stanmore – should be a alternative site to be identified.
	•	ontinue on a separate sheet if necessary)
Please note: In your representation supporting information necessary to modification(s). You should not as submissions.	to support your repres	entation and your suggested
		made if invited by the Inspector, es for examination.
	opshire Local Plan	cation to the Regulation 19: Pre- , do you consider it necessary to
-	vide an initial indication	n of your wish to participate in hearing
No, I do not wish to partici	ipate in hearing sessio	on(s)
Yes, I wish to participate in	n hearing session(s)	
(Please tick one box)		
Q7. If you wish to participat you consider this to be nece		ession(s), please outline why
you consider this to be nece		Part A Reference:
	Office Use Only	Part B Reference:

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examination	ı.		
Signature:	Vicki Norman	Date:	10/02/2021



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Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pr	e-Submission Draft of the		
Q2. To which part of the	document does this represe	ntation relate?		
Paragraph: Po	olicy: SP1 Site: STC00	Policies Map: 3		
Q3. Do you consider the Shropshire Local Plan is	Regulation 19: Pre-Submiss	ion Draft of the		
A. Legally compliant	Yes:	No:		
B. Sound	Yes:	No: 🗹		
C. Compliant with the Duty	•	No:		
(Please tick as appropriate		ulation 10: Dro Submission		
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 aims of this policy are not supported by, or conflict with, the aims of other policies in the Plan Review. In particular and in relation to the proposed industrial allocations at Stanmore, because such development would not "contribute to meeting local needs" or to "making settlements more sustainable" as Policy SP1 requires. The settlement at Stanmore is very small and does not require 11.5ha. of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the				
-	more detailed policies in the Plan.	enter as being a sound basis for the		

(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
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forward your	r suggestea revisea word	ling of any policy or tex	kt. Ple	ease be as preci	se as possible.
	02 and P58a – allocate m the Plan. There is				
		•		•	e sheet if necessary)
supporting i	e: In your representation information necessary to the following the f	o support your repres	entat	tion and your s	uggested
	stage, further submis he matters and issue				
Submission	ir representation is on Draft of the Shro e in examination h	pshire Local Plan,	, do	_	
	that while this will prov you may be asked at a				
No,	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				
	ı wish to participate der this to be neces		essic	on(s), please	e outline why
sites to ac Review, a and Coun	been considerable p ccept the proposals p nd they have not bee ty Council official and cople, who will be the heard.	out forward in the value of adequately repress of the second seco	ariou sent onsid y the	is drafts of the ed by locally dered essential proposed de	e Local Plan elected Paarish Il that the wishes velopment,
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those who h to confirm y	nave indicated that they your wish to participate	etermine the most app wish to participate in	propri n heal	iate procedure ring session(s)	to adopt to hear You may be asked

Part B Reference:



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Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pre-Submission Draft of the		
Q2. To which part of the	document does this representation relate?		
Paragraph: Po	olicy: SP10 Site: STC002/P58a Policies Map: 3		
Q3. Do you consider the Shropshire Local Plan is	Regulation 19: Pre-Submission Draft of the		
A. Legally compliant	Yes: No:		
B. Sound	Yes: No: 🗸		
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set out your comments.	The compliance men and duty to do operate, please also use also solve		
side, and are ac	sed for employment development at Stanmore is situated in open country- cessed through a country park. The Council, and the local residents in the have gone to great lengths in the past to preserve this situation.		
eas in line with r tryside will be a There is no guar allocations are a	the Local Plan Review proposes to restrict economic development in rural armational guidance. Policy SP10 says that development proposals in the counlowed where they maintain or enhance countryside vitality and character. In an attempt to side-step such limitations for future developers. There is no hallocations should be made, the countryside should continue to be pro-		

	•	e Councy are, have not i	d not be protected as the majority of the rest been justified and the need for the proposed
		(Plaace of	ontinue on a separate sheet if necessary)
Regulation compliant a	19: Pre-Submissi	ication(s) you cor on Draft of the Sh pect of any legal c	nsider necessary to make the ropshire Local Plan legally ompliance or soundness matters
Please note the examination. Your Draft of the Sl	at non-compliance with You will need to say wh hropshire Local Plan leg	h the duty to co-operat ny each modification wi gally compliant or soun	te is incapable of modification at ill make the Regulation 19: Pre-Submissior d. It will be helpful if you are able to put xt. Please be as precise as possible.
		(Please co	ontinue on a separate sheet if necessary
supporting in	formation necessary t	on you should provide to support your repres	e succinctly all the evidence and sentation and your suggested ve a further opportunity to make
		ssions may only be its he or she identifie	made if invited by the Inspector, es for examination.
Submission	Draft of the Shro		cation to the Regulation 19: Pre- , do you consider it necessary to ?
	•		on of your wish to participate in hearing your request to participate.
	•	pate in hearing session	on(s)
	[wish to participate ir se tick one box)	n hearing session(s)	
•	•	e in the hearing s	ession(s), please outline why
_	er this to be neces		coston(s), picase outline willy
		066:	Part A Reference:
		Office Use Only	Part B Reference:

There has been considerable pressure placed on nearby residents to the proposed sites to accept the proposals put forward in the various drafts of the Local Plan Review, and they have not been adequately represented by locally elected Paarish and County Council official and Members. It is considered essential that the wishes of local people, who will be those most affected by the proposed development, should be heard.

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examination	ı.		
Signature:	Vicki Norman	Date:	10/02/2021



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Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pre-Submission Draft of the
Q2. To which part of the	document does this representation relate?
Paragraph: Po	olicy: SP11 Site: STC002/P58a Policies Map: 3
Q3. Do you consider the Shropshire Local Plan is	Regulation 19: Pre-Submission Draft of the :
A. Legally compliant	Yes: No:
B. Sound	Yes: No: 🗹
C. Compliant with the Duty (Please tick as appropriate	· <u> </u>
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	compliance or soundness of the Regulation 19: Pre-Submission Draft its compliance with the duty to co-operate, please also use this box to
The sites propose and Policy SP11 the land from G strated. There so the proposal Stanmore are no	sed for employment development at Stanmore are located in the Green Belt sets out to protect the Green Belt. The proposed allocation would remove treen Belt protection without any exceptional circumstance being demonis no indication of which businesses might wish to locate at Stanmore, and appears to be a device to ensure that future development proposals at subject to the limitations imposed by Policy SP11, that is, that proposals trate that 'very special circumstances' exist.
	that the Green Belt will be protected in accordance with national policy. s to protect green belts from 'inappropriate development'. Inappropriate de-

velopment can be anything that detracts from the fundamental functions of green belts,

which are to preserve their openness and to ensure their permanence. The National Planning Policy Framework says, at para 145, that local planning authorities should regard the construction of buildings as being "inappropriate" on a green belt, unless they are for certain, specified, uses – none of which include new development for industrial purposes. lease of 11.5ha of land from the Green Belt at Stanmore for use for industrial or storage purposes, and the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites.

The proposed release of land from the green belt has not been justified, and the need for the land to be made available for employment development has not been evidenced. It is likely that, if approved, this allocation would be used for further unjustified incursions into the green belt in the future.

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(Diagon continue on a constrate cheet if necessary)

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	No, I do not wish to participate in hearing session(s)
\checkmark	Yes, I wish to participate in hearing session(s)
	(Please tick one box)

Office Use Only	Part A Reference:
	Part B Reference:

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

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examination	7.		
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Sustainability Application Local Plan	praisal	of the	Regulation	19: Pre-	Submission	Draft of	the Sh	ıropshire
Habitats Regulati Shropshire Local (Please tick one	Plan	sessm	ent of the I	Regulatio	n 19: Pre-Sı	ubmissio	n Draft	of the
Q2. To which part	of the	docu	ıment do	es this	represent	ation r	elate?	
Paragraph:	aragraph: Policy: DP18 & Site: BRD030 Policies Map:							
Q3. Do you conside Shropshire Local P		_	ulation 19	9: Pre-S	ubmissioı	n Draft	of the	3
A. Legally compliant				Yes:		No:		
B. Sound				Yes:		No:	$\overline{\checkmark}$	
C. Compliant with the	e Duty	to Co-	operate	Yes:	П	No:	П	
(Please tick as appr	opriate	·).			<u> </u>			
Q4. Please give de Draft of the Shrops fails to comply wit If you wish to support to of the Shropshire Local set out your comments.	shire I h the he lega	Local duty I comp	Plan is n to co-ope liance or so	ot legal erate. P undness o	ly compliance be a set of the Regula	ant or ins preciption 19:	s unsiise as Pre-Su	ound or possible. bmission Draft
Livestock Market: When the SAMDev Plan for Market be re-located as it wa proposed TGV will surround	as felt tha	at the m	arket was inco	ompatible w	-			
Poultry Units: Schedule S3.1(1) states that or land within the wider site					on the site, any	poultry u	nits opera	ating on the site
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 along-side 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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	Yes, I wish to participate in hearing session(s)

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	ou wish to participate in the heari sider this to be necessary:	ing session(s	s), pleas	se outline why
	225			
	e: The Inspector will determine the mos	st appropriate p	rocedure	
confirm y	have indicated that they wish to participo your wish to participate when the Inspec			
xaminatio				
ignature:	Vicki Norman		Date:	10/02/2021

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.

Pa	rt B: Represer	itation					
N	ame and Organisation:	Vicki Norman					
Q1 .	To which documen	t does this repres	entatio	on relate?			
$\overline{\checkmark}$	Regulation 19: Pre-Sul	omission Draft of the	Shropsh	ire Local Plar	า		
	Sustainability Appraisa Local Plan	l of the Regulation 1	9: Pre-Sı	ubmission Dr	aft of th	ne Shrops	shire
	Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Re	gulation :	19: Pre-Subn	nission	Draft of t	he
Q2 .	To which part of th	e document does	this re	presentati	on rel	ate?	
Para	graph:	Policy: S3	Site:	BRD030		licies Map:	
_	Do you consider the opshire Local Plan i		Pre-Sul	bmission D	raft o	f the	
	Legally compliant	-	Yes:		No:		
В.	Sound		Yes:		No:	$\overline{\checkmark}$	
	Compliant with the Duty Please tick as appropriat	•	Yes:		No:		
Q4. Dra fail If yo	Please give details of the Shropshire s to comply with the but wish to support the legal plan of the Shropshire Local Plan of the Jour comments.	of why you consi Local Plan is not duty to co-opera al compliance or soun	: legally ate. Ple dness of a	compliant case be as pathe	t or is precison 19: Pr	unsoun e as pos re-Submis	d or ssible. sion Draft
(SCI) proposed the option A sure Regularity Court view A stee June public	acknowledged that community, has taken place to a limited of osals for Bridgnorth, at Tasley to Tasley Garden Village proport for the public to examine the abstantial number of objection alation 18 consultation includincil and the surrounding Parists and no public explanation has beering group consisting of mer 2019 to consider the issues fushed in May 2020, around the does not seem to have been co	degree. However, it should and Stanmore, has taken osal was limited to online plans in person or discuss as to the Bridgnorth Plac- ing objections from the h Councils. Despite this, as been given as to why the mbers of Bridgnorth Town acing Bridgnorth and to desame time that the Tasl	d be noted to place throughout consultations them at except Plan we elected Shit would approximately a council and develop a pey Garden	that consultation ugh different me on only due to the schibitions and mere made to Sharopshire Counce ppear that no accuressed have been nd surrounding plan for the sett Village propose	n on the tweechanisms he Covid neetings. nropshire cillors for ecount has n ignored Parish Collement.	wo main de s. The late of 19 pandem Council the the area, s been take buncils was Their draft i	velopment emergence ic with no arough the the Town en of these formed in report was

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.

 Provide and the Delay a 	an explanation as to why the surrounding Parish Councils in decision on the Legal Coress have been resolved and an	views of the elected Shrop have been ignored. mpliance and Soundness of	shire Councillors for the the Local Plan until the	e area, the Town Council matters discussed under
		(Please co	ontinue on a separa	te sheet if necessary)
supporting modification submission After this	te: In your representate information necessary on(s). You should not a ns. stage, further submit the matters and issu	ion you should provide to support your repressume that you will ha	e succinctly all the estation and your some a further opported by	evidence and suggested cunity to make the Inspector,
	our representation i ion Draft of the Shr			_
Please not	ite in examination h e that while this will pro , you may be asked at a	vide an initial indication	on of your wish to p	
✓ No,	I do not wish to partici	pate in hearing session	n(s)	
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_	ou wish to participation of the contract of th	_	ession(s), pleas	e outline why
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those who l	t e: The Inspector will de have indicated that they your wish to participate n.	etermine the most app wish to participate in	ropriate procedure hearing session(s).	You may be asked
Signature:	V Norman		Date:	20/02/2021
		Office Use Only	Part A Reference	ce:
		Office Use Only	Part B Reference	ce:



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)**.

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Part	B: Represer	ntatio	n					
Name	e and Organisation:	Vicki No	orman					
Q1. To	which documen	t does t	his repres	entatio	on relate?			
√ R	egulation 19: Pre-Sul	bmission	Draft of the	Shropsh	ire Local Plar	1		
	ustainability Appraisa ocal Plan	ıl of the F	Regulation 1	9: Pre-Sı	ubmission Dr	aft of	the Shr	opshire
L S	abitats Regulations A hropshire Local Plan (<i>Please tick one box)</i>		nt of the Re	gulation	19: Pre-Subn	nissior	n Draft (of the
Q2. To	which part of th	e docui	ment does	this re	presentati	on re	late?	
Paragra	ph:	Policy:	SP2 & S3	Site:	BRD030	Р	olicies Map:	
Shrop A. Leg B. So C. Co	Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is: A. Legally compliant Yes: No: No: C. Compliant with the Duty to Co-operate (Please tick as appropriate)							
(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.								
"S3.1 De 1. Bridg tives ment the n	gulation 19: Pre-Submission evelopment Strategy: Bridgenorth will fulfil its role as in the east of the County, land to create choice and eeds of the town and surnesses to expand.	the second delivering competitio	rincipal Centro d largest Principaround 1,800 n in the marke	e pal Centre dwellings a t. New hou	and contribute to and making avai using and employ	owards lable a	strategic round 49 will make	growth objec- ha of employ- e provision for
4. New tions;	residential development w	rill also be	delivered throu	gh the save	ed SAM Dev mi	xed use	e and resi	dential alloca-
	nts: al Plan has identified an a (TW) during the period 20							

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)

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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		_				_					~	_				
	rou	inding	areas. T	his a	ssessme	nt should b	e revi	ewed eve	ry five yea	rs.						
1.	Co	mmissi	ion a Lo	ocal I	Housing	Needs Ass	essme	nt for Bri	idgnorth to	establis	sh th	ne act	ual needs	of the t	own an	d sur-

2.	Provide evidence that Bridgmort	th can sustain a	n increase in	its population of	at least 35%.

(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)?

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

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$\overline{\checkmark}$		•		•	ing session(s	, ,	•
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Please	not	e: The Insped	ctor will det				sheet if necessary) to adopt to hear
those v	vho l	nave indicated	d that they	wish to par	ticipate in he	aring session(s)	You may be asked tters and issues for
examin			articipate vi	men ene m	эрсског паз г	dentined the ma	tters and issues for
Signatu	ıre:	Vicki Norma	an			Date:	10/02/2021
J]	, ,

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)**.

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making effective repres	sentations.					
Part B: Repre	sentat	ion				
Name and Organisat	ion: Vicki	Norman				
Q1. To which docu	ment doe	s this repres	entatio	on relate?		
Regulation 19: Pi	e-Submissi	on Draft of the	Shropsh	ire Local Plan	1	
Sustainability Ap Local Plan	praisal of th	e Regulation 1	9: Pre-Sເ	ubmission Dra	aft of the S	hropshire
Shropshire Local	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 doc	ument does	this re	presentati	on relate	?
Paragraph:	Policy:	S3	Site:	BRD030	Policie: Map	
Q3. Do you conside Shropshire Local P		ulation 19:	Pre-Su	bmission D	raft of th	е
A. Legally compliant			Yes:		No:	
B. Sound			Yes:		No: 🔽	
C. Compliant with the	e Duty to Co	-operate	Yes:		No:	
(Please tick as appr	opriate).					
Q4. Please give de Draft of the Shrops fails to comply wit If you wish to support to of the Shropshire Local set out your comments. Schedule S3.1(1) states that Development will comply with the shropshire states that the support of the Shropshire Local set out your comments.	shire Loca h the duty he legal com Plan or its co Tasley Garder	I Plan is not to co-operation to co-operation of sound in Village will be a	tegally ate. Ple dness of the duty a "compreh	compliant case be as parties the Regulation to co-operate,	t or is uns precise as n 19: Pre-Su please also	sound or s possible. ubmission Draft o use this box to
Principles of Garden Village The Town and Country Pla Garden Villages based on the	nning Associat	tion (TCPA) has 1		-	-	-

1. Land value capture for the benefit of the community.

adopted by the TCPA, are:

- 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

of garden cities and whose work led to the modern planning profession and planning system. His three main principles,

		e modes of transport. The report concludes that right way. Housing numbers and targets are not
		ourban development on the outskirts of a market
	(0)	
OF Plance set out the modi	•	ontinue on a separate sheet if necessary)
Regulation 19: Pre-Submiss		nsider necessary to make the propshire Local Plan legally
		ompliance or soundness matters
you have identified at Q4 at		
Please note that non-compliance wi		
		ill make the Regulation 19: Pre-Submission nd. It will be helpful if you are able to put
forward your suggested revised wor	rding of any policy or te	xt. Please be as precise as possible.
		les but do not say how they and the landowners rmally sign up to these principles and set out in
detail how they intend to meet them?	on should hisist that I w To	miany sign up to these principles and set out in
	they will monitor the deve	lopment and ensure that TW adhere to the three
principles?		
	(Please co	ontinue on a separate sheet if necessary)
Please note: In your representat	•	. , ,
supporting information necessary	to support your repres	sentation and your suggested
modification(s). You should not a submissions.	ssume that you will ha	ve a further opportunity to make
		wanda if invited by the Tuenceton
based on the matters and issue		made if invited by the Inspector, es for examination.
O6 If your representation i	s seeking a modifi	cation to the Regulation 19: Pre-
- -		, do you consider it necessary to
participate in examination h		
•		on of your wish to participate in hearing
session(s), you may be asked at a	i later point to confirm	your request to participate.
No, I do not wish to partici	pate in hearing sessior	n(s)
Yes, I wish to participate in	hearing session(s)	
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(Please tick one box)	, ,	
,		ession(s), please outline why
,	te in the hearing s	ession(s), please outline why

Office Use Only

Part B Reference:

those who l	te: The Inspector will determine the most appropole have indicated that they wish to participate in hea your wish to participate when the Inspector has it	riate procedure aring session(s).	You may be asked
Signature:	Vicki Norman	Date:	10/02/2021



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Pa	rt B: Represer	ntation					
Na	ame and Organisation:	Vicki Norman					
Q1.	To which documen	t does this repres	sentatio	on relate?			
$\overline{\checkmark}$	Regulation 19: Pre-Sul	omission Draft of the	Shropsh	nire Local Pla	n		
	Sustainability Appraisa Local Plan	l of the Regulation 1	9: Pre-S	ubmission Dr	aft of	the Shro	oshire
	Habitats Regulations A Shropshire Local Plan (Please tick one box)		gulation	19: Pre-Subr	missior	Draft of	the
Q2.	To which part of th	e document does	this re	presentat	ion re	late?	
Parag	graph:	Policy: SP12 & S3	Site:	BRD030	P	olicies Map:	
_	Do you consider the opshire Local Plan i	_	Pre-Su	bmission [Oraft o	of the	
Α.	Legally compliant		Yes:		No:		
В.	Sound		Yes:		No:	\checkmark	
	Compliant with the Duty	•	Yes:		No:		
Dra fail If yo of th	Please give details of the Shropshire s to comply with the bu wish to support the legal of Shropshire Local Plan cout your comments.	Local Plan is not de duty to co-oper al compliance or soun	t legally ate. Ple dness of	y complian ease be as the Regulatio	t or is precis	s unsou se as po Pre-Subm	nd or ossible. ission Draft
The I footb its ex Mark	loyment Land: Local Plan confirms that, as a ball pitches) of land south of the kisting or alternative ancillary tet has been approved for a bresses and warehousing for stores.	e A458 has been approved uses. In addition, a furth usiness park for Class B	d for the re- her 6.7 ha	-location of the adjoining the a	Livestoc rea rese	k Market to rved for th	ogether with ne Livestock
In ad	dition, the TGV site will inclu	de a further 16 ha of empl	oyment lan	nd also for Class	B uses.		
Tasle	tal 29 ha of employment land by area south of the A458, all of the current Stanmore Business	of which is outside the Brid	dgnorth De	evelopment Bou			
As w	rell as setting out the above for	employment land the Lo	cal Plan ha	s identified a fu	rther 11	ha of Gre	en 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)

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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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?
	(Places continue on a congrate sheet if pocessary

(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.

000.0	may be deficed at a rater point to commit your request to
\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:	
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•	ou wish to participate in the hearing sess sider this to be necessary:	sion(s), pleas	e outline why			
those who l to confirm y	(Please continue on a separate sheet if necessary) Please note: The Inspector will determine the most appropriate procedure to adopt to hear hose who have indicated that they wish to participate in hearing session(s). You may be asked o confirm your wish to participate when the Inspector has identified the matters and issues for examination.					
Signature:	Vicki Norman	Date:	10/02/2021			



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такі	ing errective represe	ntations.					
Pa	rt B: Repres	senta	tion				
Na	ame and Organisatio	on: Vick	ki Norman				
Q1.	. To which docun	nent do	es this repre	sentatio	n relate?		
V	Regulation 19: Pre	-Submiss	sion Draft of th	e Shropsh	ire Local Plar	ı	
	Sustainability App Local Plan	raisal of t	he Regulation :	19: Pre-Sı	ubmission Dra	aft of the Shi	ropshire
	Habitats Regulatio Shropshire Local P (Please tick one i	lan	sment of the Re	egulation :	19: Pre-Subn	nission Draft	of the
Q2.	. To which part o	f the do	cument doe	s this re	presentati	on relate?	
Para	graph:	Policy	SP14, v: DP25 & S3	Site:	BRD030	Policies Map:	
_	. Do you conside opshire Local Pla		gulation 19:	Pre-Sul	bmission D	raft of the	
Α.	Legally compliant			Yes:		No:	
В.	Sound			Yes:		No: 🔽	
	C. Compliant with the Duty to Co-operate Yes: No: (Please tick as appropriate).						
Dra	. Please give deta oft of the Shropsl s to comply with	hire Loc	al Plan is no	t legally	compliant	or is unsc	ound or
of th	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.						
	astructure:						

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 offing	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)?

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

\checkmark	No, I do not wish to participate in hearing session(s))		
	res, 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 continu	e on a separate	sheet if necessary)	
those wi	note: The Inspector will determine the most appropers on have indicated that they wish to participate in heat myour wish to participate when the Inspector has ideal.	aring session(s).	You may be asked	
Signatur	e: Vicki Norman	Date:	10/02/2021	

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.

Pa	Part B: Representation					
N	lame and Organisation:	Vicki Norman				
Q1	To which document	t does this repre	sentation relate	?		
	Regulation 19: Pre-Sul	omission Draft of the	e Shropshire Local I	Plan		
	Sustainability Appraisa Local Plan	l of the Regulation 1	.9: Pre-Submission	Draft of the Shropshire		
	Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Re	gulation 19: Pre-Si	ubmission Draft of the		
Q2	. To which part of th	e document does	s this represent	ation relate?		
Para	agraph:	SP13, DP25, Policy: DP27, DP28 & S3	Site: BRD030	Policies Map:		
	. Do you consider the ropshire Local Plan i	_	Pre-Submission	n Draft of the		
Α	. Legally compliant		Yes:	No:		
В	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.

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:	
Office Use Only	Part B Reference:	

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)?

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.

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)
_	If you wish to participate in the hearing session(s), please outline why consider this to be necessary:
	(Please continue on a senarate 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.

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

Signature:	Vicki Norman	Date:	10/02/2021
Signature:	Vicki Norman	Date:	10/02/2021

Office Use Only

Part A Reference:

Part B Reference:



Representation Form

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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:			: Vicki I	Vicki Norman					
Q1.	Q1. To which document does this representation relate?								
$\overline{\mathbf{V}}$									
	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 w	hich part of	the docu	ument does	this re	presentati	on re	late?	
Parag	graph:		Policy:	DP17, DP18 & S3	Site:	BRD030	Po	olicies Map:	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:									
A.	Legally	compliant			Yes:		No:		
В.	B. Sound				Yes:		No:	\checkmark	
C. Compliant with the Duty to (Please tick as appropriate).			•	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.									
Landscape and Visual Amenity: DP 17 of the Pre-Submission Draft states:									
 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)

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

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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- 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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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)							
_	Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:							
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Please	e note: The Inspector will determine the most appropriate procedure to adopt to hear							

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Signature:	Vicki Norman			Date:	10/02/2021	
		Office Use Only	Part A Reference:			
		Office Use Only		Part B Reference:		

Shropshire Council Local Plan: Statement of Representations

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

Representation Form Part B (1):

Q2. Policy: S3

Q3. B. Sound No

Q4. Details:

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.

Q5. Actions:

- 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.

Representation Form Part B (2):

Q2. Policy: SP2 and S3

Q3. B. Sound No

Q4. Details:

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 will also be delivered through the saved SAM Dev mixed use and residential allocations; ..."

Comments:

Dwellings:

The Local Plan has identified an area south of the A458 for a development of **1,050 dwelling**s 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?

Q5. Actions:

- 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%.

Representation Form Part B (3):

- Q2. Policy: S3
- Q3. B. Sound No
- Q4. Details:

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.

Q5. Actions:

- 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?

Representation Form Part B (4):

Q2. Policy: SP12 and S3

Q3. B. Sound No

Q4. Details:

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?

O5. Actions:

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?

Representation Form Part B (5):

Q2. Policy: DP18 and S3

Q3. B. Sound No

O4. Details:

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?)

Q5. Actions:

- 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.

Representation Form Part B (6):

Q2. Policy: SP14, DP25 and S3
Q3. B. Sound No

Q4. Details:

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."

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.

O5. Actions:

- 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?

Representation Form Part B (7):

Q2. Policy: SP13, DP25, DP27, DP28 and S3

Q3. B. Sound No

Q4. Details:

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:

- 1. 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:"

O5. Actions:

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?

Representation Form Part B (8):

Q2. Policy: DP17, DP18 and S3
O3. B. Sound No.

Q4. Details:

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...."

Q5. Actions:

- 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?