

#64



COMPLETE

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Q1: Your details:

Name: De Christopher Jephcott
Organisation (if applicable)

Q2: Are you acting on behalf of anyone? No

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Q3: Who are you acting on behalf of: Respondent skipped this question

PAGE 3: Representation details

Q4: Please give the policy/paragraph/policies map details for your first representation relates to: Bridgnorth Area Policy Inset Map S3 1 & 2

Q5: Is your representation in support or objection? Object

Q6: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Legally compliant No

Sound No

Q7: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)
Not positively prepared, Not justified, Not effective,
Not consistent with the National Planning Policy Framework

Q8: Please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy.

I write on behalf of Bridgnorth Civic Society and our comments therefore relate to the Plan as it affects the Bridgnorth Area. We consider the document is not positively prepared in that it is based on an assumption that does not fully reflect objectively assessed development and infrastructure requirements. Too much reliance is placed on a subjective assertion that large scale developments of themselves will deliver more for the local community than smaller, ad hoc proposals. Our objective experience is that the smaller scale windfall schemes carried out in Bridgnorth since 2006 have, with few exceptions, resulted in better designed developments more compliant with Policy MD2, compared with the larger housing developments at Wenlock Road and the former Bridgnorth College site. Perhaps local involvement is more effective at this lower level? The mediocre result in these large schemes is an unrelated mix of the volume developers standard, national housing types, different materials, roof slopes etc., with little reference to local style or materials. Despite an enlightened development brief, the Local Planning Authority could not in the event secure improvements such as better designed fenestration.

We consider the document is not justified in that in the Bridgnorth Development Strategy S3.1: para 2 the figure of new homes to be delivered is increased to 1,400, together with around 19 hectares of employment land, necessitating the need for development south of the A458. This is at odds with the outcome of the public consultation, which used the range of 500-1,000 new homes, first introduced in the 2010 Issues and Options document. Also it is in line with the Core Strategy Page 49, Table 2 Policy CS3 and indicative scale of development for Bridgnorth. The 'firming up' of the levels with a 40% increase above the previous maximum to be in excess of requirements is certainly not in line with consultation responses and there is scant indication as to how it is arrived at. It is true that there is currently little alternative to expansion to the NW away from the Town Centre but it is acknowledged that the Green Belt will need to be reviewed at the next Local Plan Review and the required flexibility within the plan will allow any unanticipated higher growth to be accommodated.

The built up area still contains many potential windfall sites and there is no reason to believe that the rate of windfall development will slow before 2026.

Sustainability.

The proposed development at Tasley has many unsustainable features compared with the alternative revised preferred options. As regards the environmental dimension- The siting of ELR011/a and b south of the bypass intrudes into high quality agricultural landscape, not in line with Policy MD12. Also not in line with Para. 58 of the NPPF.

As regards infrastructure, demolishing a relatively new livestock market and relocating it to a less sustainable, landscape sensitive site is not sustainable. Neither is introducing an additional road traffic roundabout on the A458. Every roundabout results in time lost to road users and increased fuel consumption, due to having to slow down and accelerate again. The adverse environmental effects of this are ongoing and cumulative. (MD8). The distance of Tasley from the amenities of the Town Centre is also an unsustainable feature. Nor are the development guidelines in Schedule S3.1a realistic. In recent years two of Bridgnorth's three petrol stations have closed. On the College site space was reserved for a hotel but with no takers after a year the land went for housing. In the centre plans for a hotel in the New Market Building seem again to have foundered despite a recent grant of planning consent.

It is not clear why so much additional employment land is considered necessary, given the existing store of vacant sites with good road access to the south at Chartwell Business park and the Stanmore Industrial Estate (Map S3 inset 2). It appears that the views of the landowner and prospective developer carry more weight than those of the Tasley residents.

Consistent with National Policy.

There is no Strategic Market Housing Assessment as required under Para 159 of The NPPF working with neighbouring authorities where housing market areas cross administrative boundaries and addressing need for all types of housing including (importantly) affordable.

Q9: Explain the changes you think should be made to the SAMdev Plan in order to make it legally compliant or sound. You should explain your suggested revisions to the policy, paragraph or section of the policies map and why this change would make the plan legally compliant or sound. Please be as precise as possible.

Revise Sustainability Assessment to remove bias in favour of large scale development
Make outcome more in line with consultation responses and views of Bridgnorth Town Council and Tasley Parish Council. This involves deleting ELR011/a&b and revising development at Tasley to be more in accord with the revised Issues and Options Report so producing a more sustainable outcome.

Q10: Do you wish to make another representation? No

PAGE 4: Representation details 2

Q11: Please give the policy/paragraph/policies map details for your first representation relates to: Respondent skipped this question

Q12: Is your representation in support or objection? Respondent skipped this question

Q13: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'. Respondent skipped this question

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Q14: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)

Respondent skipped this question

Q15: Please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy.

Respondent skipped this question

Q16: Explain the changes you think should be made to the SAMdev Plan in order to make it legally compliant or sound. You should explain your suggested revisions to the policy, paragraph or section of the policies map and why this change would make the plan legally compliant or sound. Please be as precise as possible.

Respondent skipped this question

Q17: Do you wish to make another representation?

Respondent skipped this question

PAGE 5: Representation details 3

Q18: Please give the policy/paragraph/policies map details for your first representation relates to:

Respondent skipped this question

Q19: Is your representation in support or objection?

Respondent skipped this question

Q20: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Respondent skipped this question

Q21: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)

Respondent skipped this question

Q22: Please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy.

Respondent skipped this question

Q23: Explain the changes you think should be made to the SAMdev Plan in order to make it legally compliant or sound. You should explain your suggested revisions to the policy, paragraph or section of the policies map and why this change would make the plan legally compliant or sound. Please be as precise as possible.

Respondent skipped this question

PAGE 6: Finally...

Q24: Do you consider it necessary to attend and give evidence at the examination?

No, I wish to pursue my representation through this written representation

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Q25: If you wish to attend the examination please explain why you think this is necessary.

Respondent skipped this question

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Q26: Do you wish to be notified of any of the following: (we will contact you using the details you have provided)

When the SAMDev plan has been submitted for examination	Yes
When the Inspector's report is published	Yes
When the SAMDev plan is adopted	Yes