

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Morville Parish Council
------------------------	-------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

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

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

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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.

Infrastructure:

Roads and Highways:

The only transport plan available at the moment is Shropshire Council's Local Transport Plan 2011-2026. Although the Council has 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.”

Office Use Only

Part A Reference:

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, Cyclists and agricultural vehicles:

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.

It has to be recognised that Bridgnorth and the surrounding area is mainly agricultural; and there are already difficulties during busy times in the agricultural calendar that cause increased danger on the roads (e.g. harvesting) where all road users have to suffer inconvenience and frustration that sometimes leads to car drivers taking unnecessary risks, such as overtaking tractors and trailers. By increasing the number of vehicles on rural roads, the risks are significantly increased during these times when larger numbers of slower agricultural vehicles are on the road.

If you assume that there is one car per household, it is a long walk into town for a parent with a child.

(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?
- 5.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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

(Please tick one box)

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

We feel that it is important to be able to participate and contribute to the proceedings to ensure that the detail, as it unfolds, is understood and the views of local people are clearly articulated

(Please continue on a separate sheet if necessary)

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

Signature:

Eileen Reynolds

Date: 24/02/2021

Office Use Only

Part A Reference:

Part B Reference: