

Rep 37

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Robert Woodward

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Symon Amatt

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Mr and Mrs WH Broome

Dorothy Woodward

Tina and Richard Dudson

Robert Cooke

David and Heather Evans

Donna Westbury

G Healey and D Round

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Mrs J Worley

Mr and Mrs L Link

M Hampton

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Ek Wilkes

Mr and Mrs Wheawall

L Cartnan

N Bass

Mr and Mrs JT Bailey

A Whitlock

William Nixon

Norman and Gillian Jones

Mr J F Walker

## Your Representations

**Please note, you must use a separate form for each representation you wish to make.**

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

National Planning Policy Framework  
Climate Change: The UK Programme (Defra, 2006)  
UK Biodiversity Action Plan (UK Biodiversity Action Group, 1994)  
Future Water (Defra, 2008)  
The Future of Transport: A Network for 2030' (White Paper), DfT, 2004  
Corporate Climate Change Strategy 2011 (Shropshire Council)  
Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire  
Wildlife and Countryside Act (1981).  
Conservation of Species and Habitats Regulations (2010)  
Protection of Badgers Act (1992)  
Protected Species Survey by EcoTech (2010)  
Outline planning application 12/02334/OUT

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (Please tick all that apply):

Positively prepared	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**In the box below 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 (Continue on a separate sheet if necessary).

### 1. SAMDEV Plan evidence: MD8/MD12.

*Visual amenity is a measure of the visual quality of a site or area as experienced by residents, workers or visitors. It is the collective impact of the visual components, as*

*perceived by people, which make a site or an area pleasant to be in.*

Objection

The development of the site will result in the loss of an open space which is actively used by the local community and provides a green space in the currently built up area. Open space is multifunctional; it contributes to people's health and wellbeing, and provides opportunities for sport and recreation. The provision of accessible open space throughout Shropshire is therefore an important sustainability consideration.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, UK Biodiversity Action Plan (UK Biodiversity Action Group, 1994).

**2. SAMDEV document evidence: MD8.**

***Development should only take place where there is sufficient existing infrastructure capacity or where the development includes measures to address a specific capacity shortfall which it has created or which is identified.***

Objection

Highley is not an easily accessible location from the nearest towns in Bridgnorth, Bewdley or Kidderminster. People and business development will be required to travel along the current road networks, which are unsustainable for traffic in its current form; the road in places is too narrow for wide vehicles to pass safely. Bridges are unable to accommodate high sided vehicles without interruption to other road users.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**3. SAMDEV document evidence: MD8.**

***Measures to protect people and the environment from adverse effects, including: visual; noise; vibration; dust; litter; vermin, air; odour; or traffic impacts.***

Objection

There is a risk to groundwater sources from diffuse pollution, from run-off from contaminated land and potentially from new development site. The character of Highley's built environment is likely to be altered no matter which scale of development takes place. Carbon emissions are likely to increase in line with the scale of development.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, Biodiversity Action Plan (UK Biodiversity Action Group, 1994), Future Water (Defra, 2008), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**4. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**

***The site access and traffic movements, including the impact of heavy lorry traffic on the transport network, in particular the quality of the proposed access to the Primary Route Network.***

Objection

The character of Highley's built environment is likely to be altered no matter which scale of development takes place. Carbon emissions are likely to increase in line with the scale of development. The locality of the development site is unable to sustain an increase in vehicular traffic during or after the development period.

It is considered not positive, effective, justified, or consistent with National and local policies

Key objectives under Plan/Programme: Climate Change: The UK Programme (Defra, 2006), The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Corporate Climate Change Strategy 2011 (Shropshire Council), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**5. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Impacts from traffic and transport during the construction and operation of the infrastructure development.***

Objection

The character of Highley's built environment is likely to be altered no matter which scale of development takes place. Carbon emissions are likely to increase in line with the scale of development. The locality of the development site is unable to sustain an increase in vehicular traffic during or after the development period.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: Climate Change: The UK Programme (Defra, 2006), The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Corporate Climate Change Strategy 2011 (Shropshire Council), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**6. SAMDEV document evidence: MD2.**  
***Providing adequate open space of at least 30sqm per person that meets local needs in terms of function and quality and contributes to wider policy objectives such as surface water drainage and the provision and enhancement of semi natural landscape features. For developments of 20 dwellings or more, this should comprise an area of functional recreational space for play and recreation uses.***

Objection

Open space is multifunctional; it contributes to people's health and wellbeing, and provides opportunities for sport and recreation. The provision of accessible open space throughout Shropshire is therefore an important sustainability consideration. It is considered unlikely that the development site would be able to provide the required needs as stated for an area of more than 20 dwellings.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, Biodiversity Action Plan (UK Biodiversity Action Group, 1994), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**7. SAMDEV document evidence: Policy CS18.**  
***For developments of 20 dwellings and more, the open space needs to comprise a functional area for play and recreation. This should be provided as a single recreational area, rather than a number of small pockets spread throughout the development site, in order to improve the overall quality and usability of the provision.***

Objection

Open space is multifunctional; it contributes to people's health and wellbeing, and provides opportunities for sport and recreation. The provision of accessible open space throughout Shropshire is therefore an important sustainability consideration. It is considered unlikely that the development site would be able to provide the required needs as stated for an area of more than 20 dwellings.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, Biodiversity Action Plan (UK Biodiversity Action Group, 1994), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**8. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Encourage a modal shift towards more sustainable forms of transport.***

Objection

The relatively poor access to public transport for much of the county, especially in more isolated rural areas, has contributed to higher than average levels of car ownership; The private car is by far the most common mode of transport used to get to work in Shropshire. The increased use of the private vehicle for business, travel to work and leisure use is a major contributor to carbon emissions and to climate change. This will have a significant impact on both rural areas. An increase in the population of Highley will require an increase in sustainable forms of transport.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: Climate Change: The UK Programme (Defra, 2006), The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Corporate Climate Change Strategy 2011 (Shropshire Council), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**9. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Reduce the need of people and businesses to travel. People moving into the new development will most likely be moving from out of the area and therefore travelling further afield for business and employment and increasing, not reducing the need to travel for his purpose.***

Objection

The private car is by far the most common mode of transport used to get to work in Shropshire. The increased use of the private vehicle for business, travel to work and leisure use is a major contributor to carbon emissions and to climate change. The current standard of accessibility of households in Highley to hospitals is considered 'very poor'.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, Climate Change: The UK Programme (Defra, 2006), The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Corporate Climate Change Strategy 2011 (Shropshire Council), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**10. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Create active and healthier communities for all and reduce inequalities in health services.***

Objection

The current standards of accessibility of households to hospitals are considered 'very poor'. The growth in people of retirement age places particular pressure on continued service provision throughout Shropshire, but is likely to have particular implications in the more isolated rural areas.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**11. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Reduce Shropshire's contribution to climate change.***

Objection

The relatively poor access to public transport for much of the county, especially in market towns and more isolated rural areas, has contributed to higher than average levels of car ownership; The private car is by far the most common mode of transport used to get to work in Shropshire. The increased use of the private vehicle for business, travel to work and leisure use is a major contributor to carbon emissions and to climate change. This will have a

significant impact on both rural and urban areas. The increase in traffic flow and emissions as vehicles travel to and from Highley as a result of additional housing and employment facilities will be in direct conflict with this edict.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: Climate Change: The UK Programme (Defra, 2006), The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Corporate Climate Change Strategy 2011 (Shropshire Council), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**12. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Protect and improve soil quality and soil retention***

Objection

The character of Highley's built environment is also likely to be altered no matter which scale of development takes place. The impact of all levels of development on soils is uncertain. The building of property and the removal of soil and land from the area behind the properties at Park View will put those properties at risk from flooding. Evidence in the Highley Place plan identified that the Environment Agency has commented that there is potential for ground contamination issues in Highley due to its industrial heritage.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**13. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Reduce the need of people and businesses to travel***

Objection

The relatively poor access to public transport for much of the county, especially in market towns and more isolated rural areas, has contributed to higher than average levels of car ownership; the private car is by far the most common mode of transport used to get to work in Shropshire. The increased use of the private vehicle for business, travel to work and leisure use is a major contributor to carbon emissions and to climate change. This will have a significant impact on both rural and urban areas. Highley is an isolated village with poor road networks. It has already outgrown its original boundaries and purpose for housing the local workforce.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: Climate Change: The UK Programme (Defra, 2006), The Future of Transport: A Network for 2030' (White Paper), DfT, 2004, Corporate Climate Change Strategy 2011 (Shropshire Council), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**14. SAMDEV document evidence: Sustainability Appraisal Report March 2014.**  
***Protect and enhance the range and populations of species, the quality and extent of wildlife habitats and Shropshire's geological heritage.***

Objection

The provision of accessible open space throughout Shropshire is therefore an important sustainability consideration. Removal of the open space that currently occupies the area of the proposed development site will result in the loss of wildlife habitats and species population.

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: National Planning Framework, Biodiversity Action Plan (UK Biodiversity Action Group, 1994), Shropshire Community Strategy 2010 – 2020, A Flourishing Shropshire.

**15. SAMDEV document evidence: Pre-submission draft March 2014 Highley Development Strategy.**

***States that to deliver the needs for growth aspiration the site at Rhea Hall is allocated for around 30 houses.***

Objection

The plan states that there is space for 30 dwellings. However, outline planning application 12/02334/OUT (still pending consideration) foresees 21 or 22 dwellings. Why is it that this SAMDEV plan proposes 30 dwellings without any evidence to suggest that the site in question could sustain a more densely populated area than previously identified?

It is considered not positive, effective, justified, or consistent with National and local policies  
Key objectives under Plan/Programme: Outline planning application 12/02334/OUT.

**Please use the box below to 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 (Continue on a separate sheet if necessary)**

The following information provided by County Ecologist Alison Slade October 2013 in response to the Protected Species Survey by EcoTech (2010) has been omitted from the SAMDEV plan which is considered of importance and relevance to the future planning of any development and should therefore be included, and therefore changes are required to the plan accordingly.

**Slow worm** - Reptile Mitigation Strategy to ensure the protection of slow worm, protected under the Wildlife and Countryside Act 1981.

**Bats** - To ensure the provision of roosting opportunities for bats which are European Protected Species in accordance with the Conservation of Species and Habitats Regulations 2010 and the Wildlife & Countryside Act 1981

**Nesting Wild Birds**- To ensure the provision of nesting opportunities for wild birds. The site has nesting wild birds present according to the Protected Species Survey by EcoTech (2010) protected under the Wildlife & Countryside Act 1981

**Badgers**- Badgers, the setts and the access to the sett are expressly protected from killing, injury, taking, disturbance of the sett, obstruction of the sett etc by the Protection of Badgers Act 1992.

**SAMDEV document evidence: Sustainability Appraisal Report March 2014.**

***Encourage a modal shift towards more sustainable forms of transport.***

Due to the planned increase in the population of Highley as a result of additional housing which is planned for the near future, there will be the requirement for an increase in sustainable forms of transport. This means that during school hours transporting children to and from the Endowed School in Bridgnorth more buses will be needed.

In view of this, is the bus company aware of the need for extra seating and the current lack of seating? If so do they have a plan to combat this and what is the evidence for this. Has the bus company been approached by the planning department to discuss future transport need for the Highley area in line with the expected growth in population. There is no evidence in the SAMDEV plan which identifies that this has been considered or investigated this and therefore changes are required to the plan accordingly.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

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

Yes, I wish to give evidence about my representation at the examination.

☐

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

☒

If you wish to attend the examination, please explain why you think this is necessary in the box below:

**Do you wish to be notified of any of the following?** *Please tick all that apply. We will contact you using the details you have given above.*

When the SAMDev Plan has been submitted for examination	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the SAMDev Plan is adopted	<input checked="" type="checkbox"/>

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto:Planning.policy@shropshire.gov.uk)

**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**Please note, we will acknowledge receipt of representations made by e-mail.**

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.