

#### 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: Represe	ntation
Name and Organisation:	Catherine Barclay
Q1. To which documen	does this representation relate?
Regulation 19: Pre-Su	bmission Draft of the Shropshire Local Plan
Sustainability Apprais Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire
Habitats Regulations Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the
Q2. To which part of th	e document does this representation relate?
Paragraph: Appendix 6	Policy: S3.1 Site: STC002/P58a Policies Map: 3
Q3. Do you consider th Shropshire Local Plan i	Regulation 19: Pre-Submission Draft of the
A. Legally compliant	Yes: No:
B. Sound	Yes: No: 🗹
C. Compliant with the Du (Please tick as appropriat	
Draft of the Shropshire fails to comply with the If you wish to support the leg	of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or duty to co-operate. Please be as precise as possible.  al 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 ind This is not deta It seems unlike new garden vil away from the would, if the F they would still is no need for be an inapprop	st the proposed allocation of employment land in Bridgnorth contained in cates that there is a Preferred Site for Recycling and Environmental Industries. iled, but it is very worrying.  If that a recycling plant would be set up on a brand-new industrial estate in a age 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 eview Plan is approved, be removed from Green Belt protection. However, be surrounded by Green Belt and would be located in countryside where there such development. It is considered that such a location would, in any event, riate location for recycling activities. There is already such an operation not ore, 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)

**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.

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 sessionsider this to be necessary:	ion(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)	
those w	<b>note:</b> The Inspector will determine the most approper to have indicated that they wish to participate in head rem your wish to participate when the Inspector has it ation.	aring session(s)	You may be asked	
Signatu	re: C E Barclay	Date:	22/02/2021	

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.

Par	t B: Rep	resen	tat	ion					
Naı	me and Organ	isation:	Cath	erine Barcla	/				
Q1. T	o which do	cument	does	this repre	esentatio	n relat	e?		
$\checkmark$	Regulation 19	: Pre-Sub	missi	on Draft of t	he Shrops	hire Loca	l Plan		
	Sustainability Local Plan	Appraisa	of the	e Regulation	19: Pre-S	Submissio	on Draft of	the Shro	opshire
	Habitats Regu Shropshire Lo (Please tick o	cal Plan	ssessn	nent of the I	Regulation	19: Pre-	Submissior	n Draft o	of the
Q2. T	o which pa	rt of the	docı	ıment doe	s this re	presen	tation rel	ate?	
Paragı	raph:	Po	olicy:	S3.1	Site:	STC002,		Policies Map:	3
_	o you cons pshire Local		_	ılation 19	: Pre-Su	bmissio	n Draft o	f the	
A. L	_egally compli	ant			Yes:		No:		
В. 9	Sound				Yes:		No:	$\overline{\checkmark}$	
	Compliant with	•		o-operate	Yes:		No:		
Draft fails the solution of th	Please give of the Shroto comply we wish to support Shropshire Locate your comments.	pshire I vith the t the legal al Plan or	Local duty comp	Plan is no to co-ope	ot legally rate. Ple Indness of	complicase be the Regul	i <mark>ant or is</mark> as precis ation 19: Pi	unsou e as po re-Subm	nd or ossible. ission Draft
	The p as being rated does i The Lo and 4 in App indica	roposed er ing necesso part of Bri from Bridg not form a ocal Plan Ro ocal Plan Ro	ary to sidgnorth I north I natura eview F ployme nployn total o	nent allocation erve the need the town. This by a steep wood lextension to Policy S3.1 indicated in Bridge from the property of the property o	s of Bridgno is not the coded escarp Bridgnorth icates that t dgnorth. The nent Guidelland is to be	orth, and t case. The coment. It is che Bridgno de Strategionies and En callocated	he Stanmore Stanmore ar is located in a orth area wil c Land Suppl mployment L in the Place	e area is pea is phy open cou I deliver 1 y 2016 — and Supp Plan Are	eresented as esically sepa- ntryside and 1,800 houses 2038 set out oly, however, ea, with only

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-
		(Plance co	entinue en a congrate cheet if necessary)
Regul comp	lation 19: Pre-Submissi	cation(s) you con on Draft of the Sh ect of any legal c	Intinue on a separate sheet if necessary) Isider necessary to make the Iropshire Local Plan legally Iompliance or soundness matters
Please examin Draft of	note that non-compliance with nation. You will need to say wh of the Shropshire Local Plan leg	n the duty to co-operat y each modification wi ally compliant or soun	e is incapable of modification at Il make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put kt. Please be as precise as possible.
			relopment at Stanmore – should be alternative site to be identified.
		•	ntinue on a separate sheet if necessary)
suppor	rting information necessary to cation(s). You should not ass	o support your repres	succinctly all the evidence and entation and your suggested ve a further opportunity to make
After t			made if invited by the Inspector, es for examination.
			cation to the Regulation 19: Pre-
Subm		pshire Local Plan	, do you consider it necessary to
Please	-	ride an initial indicatio	n of your wish to participate in hearing
	No, I do not wish to particip	oate in hearing sessio	n(s)
$\checkmark$	Yes, I wish to participate in	hearing session(s)	
	(Please tick one box)		
_	f you wish to participate onsider this to be neces	_	ession(s), please outline why
			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.

(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:	C E Barclay	Date:	22/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



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Part B: Represer	ntation
Name and Organisation:	Catherine Barclay
Q1. To which document	does this representation relate?
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Sustainability Appraisa Local Plan	of the Regulation 19: Pre-Submission Draft of the Shropshire
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	e document does this representation relate?
Paragraph: Po	olicy: SP1 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	<u> </u>
Draft of the Shropshire fails to comply with the If you wish to support the lega	of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or duty to co-operate. Please be as precise as possible.  Il 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 Plan Reviev Stanmore, beca "making settlen is very small and to become more The Policy is not	is policy are not supported by, or conflict with, the aims of other policies in w. In particular and in relation to the proposed industrial allocations at use such development would not "contribute to meeting local needs" or to ments more sustainable" as Policy SP1 requires. The settlement at Stanmore d does not require 11.5ha. of employment development to meet its needs or e sustainable.  It based on sound evidence and is not justified as being a sound basis for the f more detailed policies in the Plan.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the
Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally
compliant and sound, in respect of any legal compliance or soundness matters
you have identified at Q4 above.

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.

	Shropshire Local Plan leg or suggested revised word			
Sites STC	002 and P58a – allocate		elopment at Stanm	ore - should be
		(Dlagge et al.)		
		•	•	te sheet if necessary)
supporting	<b>te:</b> In your representation information necessary to information necessary to information not as s.	o support your repres	entation and your s	suggested
	stage, further submis the matters and issue			
Submissi	ur representation is on Draft of the Shro te in examination h	pshire Local Plan,	do you conside	<del></del>
Please note	e that while this will prov you may be asked at a	vide an initial indication	n of your wish to pa	
☐ No	No, I do not wish to participate in hearing session(s)			
<b>√</b> Yes	s, I wish to participate ir	n hearing session(s)		
(Ple	ease tick one box)			
	u wish to participate ider this to be neces		ession(s), pleas	e outline why
sites to a Review, a and Cour	s been considerable p accept the proposals p and they have not bee aty Council official and eople, who will be the e heard.	out forward in the va en adequately repres d Members. It is co	rious drafts of th sented by locally nsidered essentia	e Local Plan elected Paarish al that the wishes
		(Please con	tinue on a separate	sheet if necessary)
those who	<b>te:</b> The Inspector will de have indicated that they your wish to participate n.	v wish to participate in	hearing session(s)	. You may be asked
Signature:	C E Barclay		Date:	22/02/2021
		Office Head Only	Part A Referen	ce:
		Office Use Only		

Part B Reference:



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Sustainability Appraisa 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	e 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: 🗹
C. Compliant with the Duty (Please tick as appropriate	<u> </u>
Draft of the Shropshire fails to comply with the	of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or duty to co-operate. Please be as precise as possible.  Il compliance or soundness of the Regulation 19: Pre-Submission Draft
,	its compliance with the duty to co-operate, please also use this box to
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 n tryside will be a There is no guard allocations are d	the Local Plan Review proposes to restrict economic development in rural armational guidance. Policy SP10 says that development proposals in the countillowed where they maintain or enhance countryside vitality and character. The antee that the proposed allocations will produce that effect, so the proposed an attempt to side-step such limitations for future developers. There is no the allocations should be made, the countryside should continue to be pro-

	of the rural area of ti		d not be protected as the majority of the rest been justified and the need for the proposed
		(Please co	ntinue on a separate sheet if necessary)
Regula compli	tion 19: Pre-Submiss	fication(s) you con ion Draft of the Sh pect of any legal c	ropshire Local Plan legally  ompliance or soundness matters
Please no examinate Draft of t	ote that non-compliance wit tion. You will need to say w the Shropshire Local Plan le	th the duty to co-operat hy each modification wi egally compliant or soun	e is incapable of modification at Il make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put kt. Please be as precise as possible.
			relopment at Stanmore – should be alternative site to be identified.
		(Please co	ntinue on a separate sheet if necessary)
supporti	ng information necessary tion(s). You should not a	to support your repres	succinctly all the evidence and entation and your suggested ve a further opportunity to make
	is stage, further submin In the matters and issue		nade if invited by the Inspector, es for examination.
Submis particip Please n	ssion Draft of the Shr pate in examination hote that while this will pro	opshire Local Plan nearing session(s)? ovide an initial indicatio	n of your wish to participate in hearing
		·	your request to participate.
LI '	No, I do not wish to partic	cipate in hearing sessio	n(s)
$\overline{\mathbf{V}}$	Yes, I wish to participate i	n 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:			
		066: 11 0 1	Part A Reference:
		Office Use Only	0 . 0 0 (

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



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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 Regulation 19: Pre-Submission Draft of the			
Q2. To which part of the	e document does this representation relate?			
Paragraph: P	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: 🗸			
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Draft of the Shropshire fails to comply with the If you wish to support the legal	Local Plan is not legally compliant or is unsound or duty to co-operate. Please be as precise as possible.  Il compliance or soundness of the Regulation 19: Pre-Submission Draft its compliance with the duty to co-operate, please also use this box to			
and Policy SP11 the land from ( strated. There so the proposa Stanmore are n	seed for employment development at Stanmore are located in the Green Belt sets out to protect the Green Belt. The proposed allocation would remove Green Belt protection without any exceptional circumstance being demonis no indication of which businesses might wish to locate at Stanmore, and I appears to be a device to ensure that future development proposals at ot subject to the limitations imposed by Policy SP11, that is, that proposals strate that 'very special circumstances' exist.			
	s that the Green Belt will be protected in accordance with national policy. is 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. The release 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.

(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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<u> </u>
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deleted from the Plan. There is no requirement for an alternative site to be identified.

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	No, I do not wish to participate in hearing session(s)
$\overline{\mathbf{V}}$	Yes, I wish to participate in hearing session(s)
	(Please tick one box)

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

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

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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Signature: C E Barclay	Date:	22/02/2021

Office Use Only

Part A Reference:

Part B Reference: