## Shropshire Council: Shropshire Local Plan



### 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.

IIIak	ing enec	tive represe	iitatio	oris.								
Pa	rt B:	Repres	ent	tati	on							
N	ame and	d Organisatio	n:	Benja	amin Barcl	ay						
01.	To whi	ch docum	ent d	loes	this repr	esent	tatio	n rela	te?			
_					-							
Ц	Regula	ation 19: Pre	-Subi	1115510	on Diait of	uie Si	irops	ille Loc	ai Piaii			
×	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan											
×	Shrops	ts Regulation shire Local P se tick one bo	lan	sessm	ent of the	Regula	ation	19: Pre	e-Subm	ission	Draft o	of the
Q2.	To whi	ch part of	the	docu	ment do	es thi	is re	presei	ntatio	n rela	ate?	
Para	graph:	Appendix 6	Ро	licy:	S3.1	S	ite:	STC00	2/P58a	Ī	Policies Map:	3
		ı consider Local Pla		Regu	lation 19	9: Pre	-Sul	bmissi	on Dra	aft o	f the	
A.	Legally	compliant				١	es:	×		No:	×	
В.	Sound					١	es:	×		No:		
	•	ant with the	•		-operate	`	es:	×		No:	×	
		k as appropi	•			. a!al a .	. 41	Dogu	latian	10.	D., C.	.b
_		give detai e Shropshi		_	-							
		nply with				_	-	_				
of the	e Shropsi	support the hire Local Place comments.										
		Appendix 6	indica	tes tha	-	Preferre	-				_	contained in al Industries.
		new garden away from would, if th they would	villag the mo ne Revi still be	e as pi ain urb iew Plo surro	roposed for T ban area – v an is approv <u>unded</u> by Gre	Tasley. very pos ved, be een Bel	This s ssibly remo t and	suggests Stanmor oved fror would be	that it nee. The some Green	night b ites pr Belt p in cou	ne set up roposed ( protectio intryside	al estate in a in a location at Stanmore n. However, where there n any event,

be an inappropriate location for recycling activities. There is already such an operation not far from Stanmore, towards Worfield, and within the Green Belt, which is the source of

environmental 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.

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Office Use Only	Part A Reference:
	Part B Reference:

#### 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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×	No, I do not wish to participate in hearing session(s)									
	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	outline why							
sites Revie and C of loc	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.									
those v asked t	(Please continue note: The Inspector will determine the most approperty who have indicated that they wish to participate in heat to confirm your wish to participate when the Inspector for examination.	riate procedure aring session(s).	You may be							
Signatı	ure: Benjamin S Barclay	Date:	22/02/21							

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Pa	rt B: Represer	ntation							
N	lame and Organisation:	Benjamin Barclay	1						
Q1.	To which document	does this repre	sentatio	n relat	e?				
	Regulation 19: Pre-Sul	omission Draft of th	e Shrops	hire Loca	al 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-	-Submissior	Draft	of the		
Q2.	To which part of the	document does	s this re	presen	tation rel	ate?			
Para	graph: P	olicy: S3.1	Site:	STC002		Policies Map:	3		
	Do you consider the opshire Local Plan is		Pre-Su	bmissio	on Draft o	f the			
Α.	Legally compliant		Yes:	×	No:	×			
В.	Sound		Yes:	×	No:				
	Compliant with the Duty	•	Yes:	×	No:	×			
	Please tick as appropriate	*							
_	Please give details of the Shropshire			_					
	s to comply with the			_					
If yo of th	u wish to support the lega e Shropshire Local Plan or out your comments.	l compliance or sour	ndness of	the Regu	lation 19: Pr	e-Subn	nission Draft		
	as being necess being part of E separated from and does not fo The Local Plan R and 49 ha of em in Appendix 6: E indicates that a	mployment allocation ary to serve the needs ary to serve the needs aridgnorth town. This Bridgnorth by a steep arm a natural extension eview Policy S3.1 indicuted in Bridgmployment Developm total of 40.5 ha of lacovided in Bridgnorth.	of Bridgnoss is not the wooded estates that to gnorth. The ent Guideland is to be	orth, and the case. Scarpment orth. The Bridgn of Strategines and Elevated	the Stanmore The Stanmo t. It is located orth area will to Land Supply mployment L I in the Place	e area is re area d in ope d deliver y 2016 – and Sup Plan Ar	presented as is physically n countryside  1,800 houses - 2038 set out ply, however, rea, with only		

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

	The discrepancy appears to be around the amount of development proposed for employment uses at Stanmore. It does not appear that the figures support this allocation.
	Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
<b></b>	(Please continue on a separate sheet if necessary)
Regular complia	ase set out the modification(s) you consider necessary to make the tion 19: Pre-Submission Draft of the Shropshire Local Plan legally ant and sound, in respect of any legal compliance or soundness matters we identified at Q4 above.
Please no examinat Draft of t	ote that non-compliance with the duty to co-operate is incapable of modification at violation. You will need to say why each modification will make the Regulation 19: Pre-Submission the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put vour suggested revised wording of any policy or text. Please be as precise as possible.
	TCO02 and P58a – allocated for employment development at Stanmore – should be from the Plan. There is no requirement for an alternative site to be identified.
	(Please continue on a separate sheet if necessary)
supportii	<b>note:</b> In your representation you should provide succinctly all the evidence and any information necessary to support your representation and your suggested tion(s). You should not assume that you will have a further opportunity to make ons.
	is stage, further submissions may only be made if invited by the Inspector, n the matters and issues he or she identifies for examination.
Submis	your representation is seeking a modification to the Regulation 19: Pression Draft of the Shropshire Local Plan, do you consider it necessary to pate in examination hearing session(s)?
	ote that while this will provide an initial indication of your wish to participate in hearing s), you may be asked at a later point to confirm your request to participate.
<b>*</b> 1	No, I do not wish to participate in hearing session(s)
	es, 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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(Please continue on a separate sheet if necessary)

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issues for e	xamination.		
Signature:	Benjamin S Barclay	Date:	22/02/21

## Shropshire Council: Shropshire Local Plan



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Pa	rt B:	Repres	sent	tati	ion							
N	ame an	d Organisati	on:	Benj	jamin Barcl	lay						
Q1.	To wh	ich docum	ent d	loes	this repr	resenta	tic	on relat	e?			
	Regu	lation 19: Pro	e-Subr	nissio	on Draft of	the Shro	ops	shire Loca	al 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 wh	ich part of	f the	docı	ıment do	es this	re	epresen	tation	rela	ate?	
Para	graph:		Pol	icy:	SP1	Site	e: [	STC002	/P58a	P	olicies Map:	3
_	_	u consider e Local Pla		Regu	ılation 19	9: Pre-9	Su	bmissio	n Dra	ft of	fthe	
A.	Legally	compliant				Ye	s:	×		No:	×	
В.	Sound					Ye	s:	×		No:		
C.	Compl	iant with the	Duty	to Co	o-operate	Ye	s:	×		No:	×	
•		ck as approp										
Draf fails	t of the	ne Shropsh mply with	nire Lo	ocal luty	Plan is n to co-op	ot lega erate. I	ally Ple	y complease be	iant o as pr	r is ecis	unsou e as p	ossible.
of the	Shrop.	o support the shire Local Pla comments.	_					_				nission Draft se this box to
		the Plan F Stanmore, "making so is very smo to become The Policy	Review. becausettleme all and commones	In page 15 pag	particular and the control of the co	nd in rela ent would able" as Po 11.5ha. of vidence ar	atio d no olic em	n to the pot "contrib y SP1 requ nployment s not justi	oropose oute to r vires. Ti develop	d indu meetii he set oment	ustrial a ng local tlement to mee	ner policies in allocations at needs" or to at Stanmore at its needs or

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·
(Please continue on a separate sheet if necessary)

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

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

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Signature:	Benjamin S Barclay	Date:	22/02/21	

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Part B: Representation							
Name and Org	anisation:	Benjamin Barclay					
Q1. To which d	locument	does this represe	entatio	on relate	?		
Regulation	19: Pre-Sul	omission Draft of the	Shrops	shire Local	Plan		
Sustainabili Local Plan	ity Appraisa	l of the Regulation 19	9: Pre-	Submissio	n Draft of t	he Shro	pshire
Habitats Re Shropshire (Please tick	Local Plan	ssessment of the Reg	gulatior	n 19: Pre-S	Submission	Draft c	of the
Q2. To which p	art of the	document does	this re	epresent	ation rela	ate?	
Paragraph:	Po	olicy: SP10	Site:	STC002/		olicies Map:	3
Q3. Do you cor Shropshire Loc		Regulation 19: P	re-Su	bmissio	n Draft of	the	
A. Legally comp	pliant		Yes:	×	No:	×	
B. Sound			Yes:	×	No:		
C. Compliant w (Please tick as	•	•	Yes:	×	No:	×	
•		<i>).</i> of why you consid	lor the	o Dogula	tion 10: I	Dro-Si	ıhmission
		Local Plan is not					
		duty to co-opera			_	•	
	ocal Plan or	l compliance or sound its compliance with th					
The sites proposed for employment development at Stanmore is situated in open countryside, and are accessed through a country park. The Council, and the local residents in the Stanmore area, have gone to great lengths in the past to preserve this situation.							
Policy SP10 of the Local Plan Review proposes to restrict economic development in rural areas in line with national guidance. Policy SP10 says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. There is no guarantee that the proposed allocations will produce that effect, so the proposed allocations are an attempt to side-step such limitations for future developers. There is no reason why such allocations should be made, the countryside should continue to be protected.							

	The reasons why this area of countryside should not be protected as the majority of the rest
	of the rural area of the Councy are, have not been justified and the need for the proposed allocation has not been properly evidenced.
	unocution has not been properly evidenced.
OF D	(Please continue on a separate sheet if necessary)
_	lease set out the modification(s) you consider necessary to make the lation 19: Pre-Submission Draft of the Shropshire Local Plan legally
comp	liant and sound, in respect of any legal compliance or soundness matters
	ave identified at Q4 above.  note that non-compliance with the duty to co-operate is incapable of modification at
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	f the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put If 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
delete	ed from the Plan. There is no requirement for an alternative site to be identified.
	(Planes and investor and a section of the section o
Dlease	(Please continue on a separate sheet if necessary)  e note: In your representation you should provide succinctly all the evidence and
suppor	ting information necessary to support your representation and your suggested
modific submis	cation(s). You should not assume that you will have a further opportunity to make
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Q6. If	f your representation is seeking a modification to the Regulation 19: Pre-
Subm	ission Draft of the Shropshire Local Plan, do you consider it necessary to
•	cipate in examination hearing session(s)?  note that while this will provide an initial indication of your wish to participate in hearing
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×	No, I do not wish to participate in hearing session(s)
П	Yes, I wish to participate in hearing session(s)
_	(Please tick one box)

Office Use Only

Part A Reference:

Part B Reference:

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issues for examination.			
Signature:	Benjamin S Barclay	Date:	22/02/21

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Part B: Represe	ntation					
Name and Organisation:	Benjamin Barclay	/				
Q1. To which documen	t does this repre	sentatio	on relat	e?		
Regulation 19: Pre-S	ubmission Draft of th	ne Shrops	shire Loca	l Plan		
Sustainability Apprais Local Plan	sal of the Regulation	19: Pre-9	Submissio	on Draft of	the Shro	opshire
Habitats Regulations Shropshire Local Plan (Please tick one box)	1	egulation	19: Pre-	Submissior	Draft o	of the
Q2. To which part of the	e document doe	s this re	presen	tation rel	ate?	
Paragraph:	Policy: SP11	Site:	STC002,		Policies Map:	3
Q3. Do you consider th Shropshire Local Plan		Pre-Su	bmissio	n Draft o	f the	
A. Legally compliant	<b>.</b>	Yes:	×	No:	×	
- , ,			×		П	
B. Sound		Yes:	-	No:	Ц	
C. Compliant with the Du	•	Yes:	×	No:	×	
(Please tick as appropria	•		. D I.	1' 10	D - C	
Q4. Please give details Draft of the Shropshire fails to comply with the If you wish to support the leg of the Shropshire Local Plan of set out your comments.	e Local Plan is no e duty to co-oper gal compliance or sour	t legally ate. Pleadness of	y complicase be the Regul	i <mark>ant or is</mark> as precis ation 19: Pi	unsou e as po e-Subm	nd or ossible. pission Draft
The sites prop and Policy SP1 the land from demonstrated and so the pro Stanmore are	posed for employment a 11 sets out to protect the m Green Belt protect There is no indication posal appears to be a continuous not subject to the limite postrate that 'very specion	ne Green B tion with of which b device to e ations imp	elt. The property out any object any object and the property of the property o	roposed allo exceptional might wish to future devel olicy SP11, tl	cation w circums o locate d lopment	ould remove tance being at Stanmore, proposals at
National polic development o	lys that the Green Belt y is to protect green b can be anything that de preserve their openne.	elts from etracts froi	'inappropr n the fund	iate develop amental fun	ment'. Ir ctions of	nappropriate

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)

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	Yes, I wish to participate in hearing session(s)
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issues for examination.			
Signature:	Benjamin S Barclay	Date:	22/02/21