

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	Represen	tation					
Name ar	nd Organisation:	Steven Banfield					
Q1. To wi	nich document	does this repres	sentatio	n relate	?		
Regu	lation 19: Pre-Sub	mission Draft of th	e Shrops	hire Local	Plan		
	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
☐ Shro	tats Regulations Asphire Local Plan Asse tick one box)	ssessment of the Ro	egulation	19: Pre-S	Submissior	n Draft o	f the
Q2. To w	nich part of the	document does	this re	present	ation rel	ate?	
Paragraph:	Appendix 6	olicy: S3.1	Site:	STC002/		Policies Map:	3
	ou consider the e Local Plan is	Regulation 19:	Pre-Sul	bmissioı	n Draft o	f the	
A. Legall	y compliant		Yes:		No:		
B. Sound	I		Yes:		No:	\checkmark	
•	liant with the Duty	·	Yes:		No:		
Draft of the fails to control of the fails to control of the fails to control of the fails of th	he Shropshire I omply with the to support the legal oshire Local Plan or	of why you constance of Plan is not duty to co-oper of compliance or soun its compliance with	: legally ate. Ple dness of	compliance compliance compliance compliance complete comp	ant or is as precis ation 19: Pi	unsoui e as po re-Submi	nd or ssible. ssion Draft
	Appendix 6 indic This is not detail It seems unlikely new garden villa away from the n would, if the Re they would still b is no need for su be an inappropr	t the proposed allocates that there is a Preed, but it is very worry that a recycling plant ge as proposed for Tasinain urban area — very view Plan is approved the surrounded by Green ch development. It is ate location for recycle, towards Worfield,	ferred Site ving. would be sley. This y possibly d, be remo n Belt and considere ling activit	set up on a suggests th Stanmore. oved from o would be lo ed that such	ng and Envi brand-new oat it might i The sites p Green Belt ocated in cou h a location is already s	ronmenta v industria be set up i proposed a protection untryside v would, in such an op	I Industries. Il estate in a in a location at Stanmore in. However, where there in any event, peration not

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:
Office Use Only	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:	on(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	note: 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: Steven John Banfield	Date:	20/02/2021		

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)**.

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Part B: Represer	ntation		
Name and Organisation:	Steven Banfield		
Q1. To which document	does this representation relate?		
Regulation 19: Pre-Sul	bmission Draft of the Shropshire Local Plan		
Sustainability Appraisa Local Plan	al 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: S3.1 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	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.		
	of compliance or soundness of the Regulation 19: Pre-Submission Draft its compliance with the duty to co-operate, please also use this box to		
as being necesso being part of Br rated from Bridg	mployment allocations at Stanmore are presented in the Local Plan Review ary to serve the needs of Bridgnorth, and the Stanmore area is presented as ridgnorth town. This is not the case. The Stanmore area is physically sepagnorth by a steep wooded escarpment. It is located in open countryside and natural extension to Bridgnorth.		
The Local Plan Review Policy S3.1 indicates that the Bridgnorth area will deliver 1,800 houses and 49 ha of employment land in Bridgnorth. The Strategic Land Supply 2016 – 2038 set out in Appendix 6: Employment Development Guidelines and Employment Land Supply, however, indicates that a total of 40.5 ha of land is to be allocated in the Place Plan Area, with only 37.7 ha to be provided in Bridgnorth. Clearly there is a discrepancy in the figures. The Local			

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	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.

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Signature:	Steven John Banfield	Date:	20/02/2021	

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



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Part B: Represer	ntation			
Name and Organisation:	Steven Banfield			
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Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire			
Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the			
Q2. To which part of the	e document does this representation relate?			
Paragraph: P	olicy: SP1 Site: STC002/P58a Policies Map: 3			
Q3. Do you consider the Shropshire Local Plan is	e Regulation 19: Pre-Submission Draft of the			
A. Legally compliant	Yes: No:			
B. Sound	Yes: No: 🗸			
C. Compliant with the Dut	— — —			
Draft of the Shropshire fails to comply with the If you wish to support the legal	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 aims of this policy are not supported by, or conflict with, the aims of other policies in the Plan Review. In particular and in relation to the proposed industrial allocations at Stanmore, because such development would not "contribute to meeting local needs" or to "making settlements more sustainable" as Policy SP1 requires. The settlement at Stanmore is very small and does not require 11.5ha. of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of 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.

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	Shropshire Local Plan leg r suggested revised word				
	002 and P58a – allocate om the Plan. There is				
		•		•	te sheet if necessary)
supporting i	e: In your representation information necessary to some the sould not as sould	o support your repres	enta	ntion and your s	uggested
	stage, further submis	sions may only be n	nad	e if invited hv	the Inspector
	he matters and issue				
Q6. If you	ır representation is	seeking a modific	ati	on to the Reg	gulation 19: Pre-
	on Draft of the Shro se in examination he	-		you conside	r it necessary to
	that while this will prov			your wish to pa	articipate in hearing
session(s),	you may be asked at a	later point to confirm	you	r request to par	ticipate.
∐ No,	I do not wish to partici	pate in hearing session	n(s)		
_					
`	ase tick one box)		_		
	ı wish to participato der this to be neces		essi	on(s), please	e outline why
There has	been considerable p	ressure placed on n		•	
	ccept the proposals p and they have not bee				
and Coun	ty Council official and	l Members. It is co	nsi	dered essentia	al that the wishes
should be	eople, who will be the heard.	ose most affected by	y tn	e proposea ae	evelopment,
		(Please con	tinu	e on a separate	sheet if necessary)
those who h	e: The Inspector will denaye indicated that they your wish to participate	wish to participate in	hea	aring session(s)	. You may be asked
Signature:	Steven John Banfield			Date:	20/02/2021
				Part A Reference	ce:
		Office Use Only		D . D D .	

Part B Reference:



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Name and Organisation:	Steven Banfield		
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Sustainability Appraisa Local Plan	l of the Regulation	19: Pre-Submissior	n Draft of the Shropshire
Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the R	egulation 19: Pre-S	Submission Draft of the
Q2. To which part of the	document does	this representa	ation relate?
Paragraph: Po	olicy: SP10	Site: STC002/F	Policies Map: 3
Q3. Do you consider the Shropshire Local Plan is	_	Pre-Submission	Draft of the
A. Legally compliant		Yes:	No:
B. Sound		Yes:	No: 🗹
C. Compliant with the Duty (Please tick as appropriate	•	Yes:	No:
Q4. Please give details of Draft of the Shropshire fails to comply with the	Local Plan is not	t legally complia	ant or is unsound or
If you wish to support the lega of the Shropshire Local Plan or set out your comments.	l compliance or soun	dness of the Regula	tion 19: Pre-Submission Draft
side, and are ac		ntry park. The Counc	nore is situated in open country- il, and the local residents in the reserve this situation.
eas in line with r tryside will be a There is no guar allocations are a	national guidance. Pol llowed where they mo antee that the proposo an attempt to side-ste	icy SP10 says that devaintain or enhance co ed allocations will proc p such limitations fol	onomic development in rural arvelopment proposals in the coununtryside vitality and character. duce that effect, so the proposed future developers. There is noside 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.
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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)		
	ou wish to participat nsider this to be nece		ession(s), please outline why
		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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Signature:	Steven John Banfield	Date:	20/02/2021	

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Sustainability App Local Plan	oraisal	of th	e Regulation	19: Pre-S	Submissio	on Draft of	the Shro	pshire
Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)								
Q2. To which part o	f the	docı	ıment doe	s this re	presen	tation rel	ate?	
Paragraph:	Pol	licy:	SP11	Site:	STC002,		Policies Map:	3
Q3. Do you consider Shropshire Local Pla		Regu	ulation 19	: Pre-Su	bmissio	n Draft o	f the	
A. Legally compliant				Yes:		No:		
B. Sound				Yes:		No:	\checkmark	
C. Compliant with the	•		o-operate	Yes:		No:		
Q4. Please give deta Draft of the Shropsl fails to comply with If you wish to support the of the Shropshire Local Plaset out your comments.	nire L the c	ocal luty comp	Plan is no to co-ope liance or sou	ot legally rate. Ple Indness of	complicase be the Regul	i <mark>ant or is</mark> as precis ation 19: Pi	unsoui e as po re-Submi	nd or ssible. ission Draft
and Policy the land f strated. so the pro Stanmore	SP11 s rom Gr There is oposal o are not	ets ou een B no in appea t subje	employment of the protect to be discation of wars to be a detect to the limitatives of the control of the contr	he Green Book without and the hich busined to ensite to ensite to ensite imp	elt. The p ny excepti sses might sure that j osed by P	roposed allo onal circums twish to loca future devel olicy SP11, t	cation wo stance be ate at Sta opment p	ould remove ing demon- nmore, and proposals at
Policy SP11 says that the Green Belt will be protected in accordance with national policy. 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)

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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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CAUTITICATION	1.		
Signature:	Steven John Banfield	Date:	20/02/2021

Office Use Only

Part A Reference:

Part B Reference: