



Mr Eddie West
Planning Policy & Strategy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

26th February 2021

Dear Mr West

SHROPSHIRE LOCAL PLAN REVIEW – REGULATION 19 CONSULTATION, FEBRUARY 2021

Please accept this letter and related attachments as part of the official consultation response from Save Bridgnorth Greenbelt (SBGB). As you know, Save Bridgnorth Greenbelt is a constituted, not for profit, unincorporated association formed in response to Shropshire Council's proposals for Stanmore.

Save Bridgnorth Greenbelt provides a voice for residents of both Worfield & Rudge, and Bridgnorth Town Parishes. Over 500 people attended our public meetings, a similar number subscribe to our newsletter, and we have a strong online presence and social media profile, we have over 1,000 followers of our Facebook page for instance. We have garnered significant regional press and media interest. A survey we conducted in 2019 found that of 1,044 responses 98% (991 people) rejected development in the Green Belt at Stanmore.

Further, in February 2021 SBGB asked our supporters for their express permission to represent them in this Regulation 19 Consultation and in the subsequent Examination in Public. This was an opt-in exercise conducted by email (MailChimp), on social media and by paper form.

Local people were asked to either email us directly, or sign a form, giving us express permission to represent them. At the time of writing 92 people have contacted us to confirm they are happy for us to make arguments to protect the greenbelt on their behalf. Local people have been very poorly represented by their parish councils, county councillors, and elected members – disgracefully so – and SBGB was formed to fill this representation gap.

We are supported in our endeavours by an experienced planning consultant, Clive Roberts of Kembertons (we share his support with the Hobbins Management Co Ltd, although our submission should be considered separate to that of HMC Ltd) and Simon Kelly of Richard Buxton Solicitors, specialists in Environmental and Planning Law. With their support we have submitted a series of representations relating to certain policies contained in the Regulation 19 consultation draft of the Local Plan Review and we wish to make our position in relation to the comments clear.

The current consultation asks for the responders' views on whether the Draft Plan is “sound”, whether it is legally compliant and whether it has been prepared in accordance with the duty to co-operate. The submission that accompanies this letter concerns itself with the “soundness” of the Plan.

You will see that we have concluded that the plan cannot be considered “sound” due to the proposed allocation of two employment sites at Stanmore (Sites STCo02 and P58a.). It appears to us that the proposal to develop these sites for employment uses represents unjustifiable and unnecessary extensions of industrial development into the green belt. Such development, in our view, conflicts with other policies in the Plan which establish general development principles. Whilst, then, we have chosen not to express concern about some of the general and strategic policies in the Plan, we are concerned that these policies are expressed at length in the draft plan and yet appear to be ignored when in apparent conflict with more detailed policies - such as the employment allocations at Stanmore. Incidentally, we remain incredulous that protection of the green belt is not expressed as a major strategy in the Plan.

Our comments, then, are made in respect of this single aspect (i.e., the proposed employment developments at Stanmore) and we have not commented on other issues except where the Stanmore proposal clearly conflicts with the operation of other policies. We have commented on the lack of hard evidence of need for the proposed employment development at Stanmore; we have not been able to find anything that demonstrates that the provision of more employment development at Stanmore is so pressing that green belt principles should be set aside.

Having said that, we keep in mind the situation relating to the proposed new village at Tasley.

You will know that we have been involved with the Local Plan Review since the autumn of 2018 when it was first discovered that Shropshire Council were proposing a “new village” at Stanmore. We campaigned against that proposal, and the Council eventually dropped the idea when a better site for the development at Tasley, outside the green belt and compliant with National Policy, emerged.

The Draft Local Plan that is the subject of the current consultation exercise, of course, includes the proposal for a “new village” at Tasley only, and whilst we remain sceptical of the scale of growth proposed for Bridgnorth as a whole, we have included a submission in support of that proposal. The current Draft Plan proposes only employment development at Stanmore, and so that is all we may comment upon.

Nevertheless, we are aware that there are other parties that are likely to submit objections to the proposed development at Tasley, and that they might attempt to re-open the prospect of the “new village” being sited at Stanmore. It may be that this issue will become a topic of debate at the Public Examination of the Plan.

We have no desire to hold up the planning process or make it any more complicated than it is, but, if it should be that the idea that the “new village” should a) not be sited at Tasley and/or b) that it should again be sited at Stanmore, we would expect to be given the opportunity to make further written submissions on the proposal(s) and to be invited to the Examination so that we could take part in the debate.

We would be very grateful, then, if you would please “tag” or append the above explanation of our position to each of the submissions made on behalf of Save Bridgnorth Greenbelt in order that our lack of objection to some of the policies involving general principles is not taken as an indication that we do not have concerns about the manner in which they are interpreted when detailed proposals are considered.

Yours sincerely

Rebecca Turner
Campaign Manager
Save Bridgnorth Greenbelt

Representation Form

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Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
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Q1. To which document does this representation relate?

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- 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:	<input type="text" value="DP18"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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|------------------------------------------|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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Policy DP18: Pollution and Public Amenity

Plan is **unsound**.

Policy DP18 sets out the Council's desire to reduce pollution and safeguard public amenity through development proposals. Proposals, it says, should be designed to safeguard environmental quality and public amenity, minimise pollution etc.

Policy DP19.1 says that development must be appropriate to its location, and the site is suitable for its proposed use.

Policy DP19.2 and.3 expresses concern about air quality. Policy D19.4 confirms that development should avoid, if possible, the use of Grade 1, 2 and 3a agricultural land.

Policy DP19.5 says that the use of previously developed land is encouraged. Policy DP19.7 indicates that development should not create unacceptable adverse effects through increase in noise levels.

The proposed employment development at Stanmore would be in conflict with most of the issues set out in Policy DP19 because the land proposed for employment allocation is in "countryside", in the Green Belt and distant from significant areas of residential development. The local environment is relatively calm, quiet and with good air quality, on land that is Grade 3 abutting Grade 2 agricultural land, and thus likely to be Grade 3a.

It is noted that, at Appendix 6 to the Review a note is inserted which indicates that Bridgnorth is a preferred site (though unspecified) for 'recycling and environmental industries. This is very concerning if it is intended to imply that Stanmore would be a suitable place to locate recycling or environmental industries. This would place such industries, often unpleasant both in operation and local pollution (visually and in terms of noise, odour, and dust) in a green belt situation in open countryside. That is entirely inappropriate. There is current experience in the near vicinity of such operations causing difficulties.

The proposed employment development at Stanmore is therefore unjustified and un-evidenced. It will, in fact add to local pollution issues and would harm public amenity.

(Please continue on a separate sheet if necessary)

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The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

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Signature: RJ Turner

Date: 01/02/2021

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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S3.1(i)"/>	Site:	<input type="text"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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<p>Policy S3.1(i): Development in Bridgnorth, in relation to development at Tasley.</p> <p>The proposals advanced in Policy S3.1(i) as far as the housing development in the proposed Garden Village at Tasley is concerned, are supported. The inclusion of employment land and community facilities and open amenity land in the project is also supported as this will ensure a sustainable development.</p>

(Please continue on a separate sheet if necessary)

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RJ Turner

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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S3"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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Policy S3: Bridgnorth Place Plan

Plan is **unsound**.

Policy S3 relates to development proposals in the Bridgnorth Place Plan area, that is it includes proposals for other villages within an area surrounding Bridgnorth as well as a large rural area.

Policy S3.1 relates to the Development Strategy for Bridgnorth as a Principal Centre (as proposed in Policy SP2: Strategic Approach)

The current Local Plan for the area comprises the Shropshire Core Strategy 2006 – 2026 and the Site Allocations and Management of Development Plan 2006 – 2026. These will be replaced in large measure by the Plan produced following the completion of the current Review.

The Review indicates that it is intended that Bridgnorth will grow by the addition of 1800 houses, of which just over 1000 are to be accommodated in a new garden village/sustainable urban extension at Tasley. These houses will be supported by employment allocations which are to be carried forward from the SAMDev allocations as none was developed in that plan period (i.e., from 2006 to date) and 11.5 ha of land at Stanmore.

The SAMDev Plan had indicated that Bridgnorth should grow by 1400 dwellings with 13 ha of employment land, which would include 6.6 ha to relocate the existing Livestock Market. This land was to be sited at Tasley and is now 'carried forward' to form the basis for the allocations in the Review plan for Bridgnorth.

The proposed relocation of the Livestock Market remains a proposal in the Review, meaning that 6.6 ha of the 'saved' allocation from the SAMDev Plan needs to be subtracted from the proposed 16 ha of land referred to in Policy S3 as being for employment uses. Schedule S3.1(i) indicates that the employment land at Tasley will be 16 ha of which 6.6 ha will be reserved for the relocation of the livestock market, meaning 9.4 ha would be available for Class B, E, certain C and sui generis uses.

The employment land supply for Bridgnorth is set out in Appendix 6 to the Pre-submission draft of the Local Plan. This indicates that the allocations 'saved' from the SAMDev plan amount to 8.25 ha, though there is no explanation of how that figure was arrived at. There is also no explanation of the need for a total land supply for employment in Bridgnorth town of 40.5 ha with a 'new' allocation of 27.4 ha, or where the total new allocation is to be located.

The SAMDev Plan, then, planned for 1400 houses for the town and the provision of just over 13 ha (including the livestock market) of employment land. However, there is no explanation of why a planned increase of 1800 in the current Local Plan Review should result in a requirement for 40.5 ha of employment land and 27.4 ha of new allocations.

Shrewsbury, identified as the Strategic Centre for the County, having the largest population, greatest number of jobs and social and retail facilities and provision, is indicated in the Review as being required to grow by some 8,625 dwellings. Its strategic employment land supply (as set out in Appendix 6) however, indicates that some 113.4 ha. of land are required with just 50 ha. being 'new' allocations.

There is no explanation of why an increase in the number of dwellings at Shrewsbury of nearly 5 times the increase proposed for Bridgnorth requires less than 3 times the amount of employment land or less than half of the land for 'new' employment allocations, proposed for Bridgnorth. This is especially the case when it is clear the first 3 years of the proposed Plan period (2016 – 2019 inc.) the delivery of employment land was around 13 times greater in Shrewsbury than in Bridgnorth, a clear indication of greater need and demand.

There does not appear to be any justification for the level of employment land provision proposed in the Review, for Bridgnorth.

In 2017 Shropshire Council produced a Market Towns Profile. No doubt the Council referred to the information it contained in the preparation of the Local Plan Review.

The Profile revealed that Bridgnorth is the third largest town in Shropshire with a population of 12,200 in the Parish. It was projected to increase to 14,500 by 2026. Nevertheless, this increase has not resulted in increased pressure for employment land release or development. Indeed, if anything, Bridgnorth has been losing employment opportunities in the recent past, even though allocated land with ready access, has existed.

In terms of age structure, the Profile indicated that Bridgnorth had a higher than the Shropshire average, of people in every age group in the 60 - 85 plus cohorts (ONS mid-year estimate, 2015). 60.0% of people in

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	Part B Reference:

Shropshire were of working age (i.e., between 16-64) while this figure was 58.7% in Bridgnorth. For comparison, in Shrewsbury 62.3% of the population were of working age (the West Midlands figure was 62.3% while the figure for Great Britain was 63.3%).

The Profile noted that, in the five years to 2017 the number of jobs in the town had fallen by 9.2%, whilst in Shropshire overall it had risen by 2.9%. Manufacturing jobs accounted for 15.7% of jobs in Bridgnorth compared to 10% in Shropshire as a whole.

Despite this, the Profile recorded that Bridgnorth (town) had a very low level of deprivation. All but one on the output areas identified in the Index of Multiple Deprivation assessed by the DCLOG in 2017 were within the 10th, 8th, 7th or 6th least deprived deciles nationally.

A list of main employers (employing between 40 and 948 people each) in Bridgnorth was included in the Profile. Of that list of 21 employees, none is located at Stanmore.

The Profile also recorded that of the 16-64 age group of people living in Bridgnorth 80.9% were economically active, slightly higher than for Shropshire. Of those that were economically active 3.4% were unemployed, compared with 4.3% for Shropshire and 5.8% for England. Household income, however, is higher in Bridgnorth than the average for Shropshire.

Further, the Profile also suggested that net commuting in and out of the town for employment purposes was very nearly equal, with around 4,690 people living in Bridgnorth but working elsewhere and around 4,419 people working in Bridgnorth but living elsewhere. This does not suggest that there is any lack of employment opportunity in the town.

The above figures perhaps suggest why there is no great pressure for additional employment land in Bridgnorth. The population is generally older than the rest of Shropshire, thus there are less economically active persons living in the town, but those that are of working age are mostly in employment. There has been no pressure to develop land allocated for employment development over the past 10-15 years, even though the number of jobs in the town has been falling. The reason for the decline appears to be lack of need rather than lack of available land.

The Local Plan Review does not explain why the Council considers that significant new allocation for employment should take place in Bridgnorth, or, more particularly, at Stanmore. Stanmore is dissociated from Bridgnorth, cannot be accessed (reasonably) on foot or cycle from the town, and is inadequately served by public transport. Almost anyone working at Stanmore has to access the existing industrial site by private motor car. There is no suggestion in the Council's Plan that the employment sites proposed for Stanmore would do anything other than make the present situation worse.

It is clear that there is no immediate need for new allocated employment sites to be opened up. Nevertheless, Appendix 7 to the Review: Forecast of Delivery Timescales for Local Plan Allocations indicates that the land at Stanmore will come on stream in the period 2020/21 – 2024/25. There is absolutely no evidence to suggest that this land is necessary in the short term, or that there is excessive and immediate demand that cannot be accommodated other than on the green belt land at Stanmore.

The proposed additional employment sites at Stanmore cannot be justified, and the evidence for such a proposal does not exist. There can be no certainty that, if allocated, the land would be developed (given that a large percentage of the existing industrial estate has not been developed) or that it would generate significant job opportunities. The fact that the allocations would also represent incursions into green belt and open countryside means that the proposals conflict with national policy as set out in the NPPF.

The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area's objectively assessed needs and should be based on proportionate evidence. It does

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not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

(Please continue on a separate sheet if necessary)

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SP1 – Strategic Approach

Other policies in the Plan Review conflict with the aims of Policy SP1. The issue of various policies being in conflict with others, and in particular with Policy SP1, is a recurring matter in this Local Plan Review. The Plan will not be effective in delivering the aims of Policy SP1 because of conflict with other policies.

As an example, the proposal to allocate more land adjacent to the Stanmore industrial Estate for, in total, some 11.5 ha of Class B, E, certain types of C, and sui generis, uses as set out in Policy S3, is in conflict with Policy SP1 in that it,

- will not support the health and well-being of any particular community,
- will not contribute to creating or maintaining any cohesive community,
- will have little if any positive effect on climate change,
- will not preserve or enhance any natural environment,

- e) will not raise design standards or enhance the County’s character or historic environment,
- f) it has not been demonstrated that it will make efficient use of land – as the sites proposed are green field then it is questionable whether they can be regarded as being more efficiently used for employment purposes, and
- g) It is highly unlikely that any future proposals relating to the proposed sites will provide any level of infrastructure that goes beyond the minimum necessary for the proposal in hand.

The proposal for development at Stanmore clearly cannot be justified in terms of Policy SP1 which says that “development will contribute to meeting local needs and making settlements more sustainable”. The local employment needs of the settlement at Stanmore would not support the existing Industrial Estate at Stanmore, let alone further significant additions. The settlement at Stanmore is very small and is clearly regarded as a separate entity from Bridgnorth because the Council was, at one time, proposing to use it as a base for a new village, quite separate from Bridgnorth.

The development now proposed for Stanmore would then, conflict with Policy SP1, as it would not meet any identified local need and would not make Stanmore more sustainable. The proposal for development at Stanmore has, then, not been positively prepared as it will not meet the area’s assessed need, is not justified or evidenced as there is no need for the development, will not be effective because there is no evidence to demonstrate that the allocations will be taken up in the short term when it is clear that operators are moving away from the Estate, and is in clear conflict with national policy as the proposed sites are located in open countryside and in green belt. The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area’s objectively assessed needs and should be based on proportionate evidence. It does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

(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.

The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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

Office Use Only	Part A Reference:
	Part B Reference:

modification(s). You should not assume that you will have a further opportunity to make submissions.

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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:

Save Bridgnorth Greenbelt can bring a local perspective, and represent the views of local residents. This is particularly important because local people feel ignored by Shropshire Council, and feel they have not been adequately represented by their parish councils and county councillors. As per our covering letter, Save Bridgnorth Greenbelt conducted an opt-in exercise, and very many local residents gave us express permission to represent their views in both the consultation and examination.

(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: RJ Turner

Date: 01/02/2021

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.

Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP2"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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.

Policy SP2: Strategic Approach

Policy SP2 indicates that new development will "respond positively to its setting, local needs and climate change".

The Plan further indicates the intention to deliver 300 ha of employment development in the County in the Plan period. To do this a greater figure is likely to be needed to allow for allocated sites not coming forward or land with planning permission not being actually developed in the Plan period. It is difficult to work out precisely what the figure of need for employment land is in the County.

The Council commissioned a study by Nathaniel Lichfield in December 2020 which was entitled "Shropshire Economic Development Needs Assessment - Interim Report". This estimated that identified need for employment land was a (gross) range of between 162 ha and 264 ha. This would suggest an over-supply of employment land in the order of 12 - 114 ha. with a total supply of 276 ha.

However, Appendix 6 to the Reg.19 Draft of the Local Plan indicates that a strategic land supply of 414 ha is necessary. There is no explanation of how this figure was arrived at, other than by totalling the set of figures contained in the appendix, but that does not explain why each figure is high.

So, this level of provision is not evidenced or justified.

The estimated need for 300 hectares of employment land appears to be an aspirational target rather than one that is actually based on identified need and making settlements more sustainable. This extends to the proposed allocation of two sites at Stanmore (totalling 11.5 ha) in a settlement that has no need for further employment provision. The figure given in Appendix 6 to the Reg19 Draft of the Local Plan indicate that Bridgnorth of which 27.4 ha will be new allocations. Quite why it is necessary to allocate such a level of new sites is not explained and, as only 1.2 ha of land was developed in the first three years of the Plan period, the figures set out are unnecessarily high, and probably not deliverable. Demand in the County, the Economic Needs Assessment indicates, is likely to be centred on the A5/M54 corridor, which, of course, Bridgnorth is peripheral to, again suggesting that demand is going to be limited in Bridgnorth.

The emphasis in the Policy is very much on meeting local need, and even if the proposed allocations at Stanmore are intended to cater for Bridgnorth town rather than Stanmore itself, it remains clear that the Stanmore employment sites are unnecessary. The Draft Plan does not evidence a quantitative or qualitative demand that might be used to justify development at Stanmore and thus loss of green belt. Given the amount of currently available but undeveloped or unused employment land in the town and, in particular, at Stanmore, the allocations that exist and are to be carried forward from the SAMDev Plan and the additional allocation being proposed in association with the Garden Village/Sustainable Urban Extension at Tasley, there is clearly no need for further allocations to serve the employment needs of Stanmore, or Bridgnorth.

Stanmore stands in an area of open countryside and in the West Midlands Green Belt that is outside any Principal or Key Centre, or Community Hub or Cluster. Policy SP2.6 says that, outside such settlements "new development will consist of affordable housing where there is evidence of local needs and appropriate rural employment and economic diversification". It is clear that Policy SP2.6 does not support the proposed allocation of 11.5 ha of unneeded employment land at Stanmore. Stanmore is not identified as a Community Hub or Community Cluster, and lies in countryside and green belt. The extension of an existing industrial site for Class B employment is not "appropriate rural development or economic (rural) diversification".

The proposal for Stanmore is, obviously, in conflict with Policy SP2.6.

The proposed employment development at Stanmore would, then, be in conflict with the aims of Policy SP2, and would not be justified, evidenced or effective in meeting the aims of Policy SP1.

The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area's objectively assessed needs and should be based on proportionate evidence. It does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

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The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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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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:

Save Bridgnorth Greenbelt can bring a local perspective, and represent the views of local residents. This is particularly important because local people feel ignored by Shropshire Council, and feel they have not been adequately represented by their parish councils and county councillors. As per our covering letter, Save Bridgnorth Greenbelt conducted an opt-in exercise, and very many local residents gave us express permission to represent their views in both the consultation and examination.

(Please continue on a separate sheet if necessary)

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Signature: RJ Turner

Date: 01/02/2021

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.

Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP4"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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.

Policy SP4: Sustainable Development

To be effective all policies should complement each other, and none should work against another, particularly when they involve National Policy.

The NPPF is clear that land in a Green Belt should be protected from development unless there are exceptional circumstances that are fully evidenced and justified, through the preparation of local plans.

There is no evidence to justify the need for development of land adjacent to the existing Stanmore Industrial Estate, and no exceptional circumstances that could justify the proposal have been put forward. The Council's Paper "Green Belt Release Exceptional Circumstances Statement" of December 2020 does not identify any circumstance which is exceptional.

At present, the land that is the subject of the proposed employment allocation is Green Belt, and, if a planning application were to be submitted for employment development on the land, unless very special circumstances, probably for a specific form of development or operator, were advanced, permission for the development would be refused. An unjustified allocation in a Local Plan should not be used to circumvent accepted planning principles. Such development would be unsustainable and would be in conflict with Policy SP4.

Unless there is specific justification, and in the case of Stanmore there is none, such allocations should not be adopted.

(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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(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)

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

Office Use Only	Part A Reference:
	Part B Reference:

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Signature:

RJ Turner

Date:

01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP6"/>	Site:	<input type="text"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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 checked="" type="checkbox"/> | No: | <input 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.

SP6 – Managing Housing Development
The proposals advanced in Policy SP6 as far as the housing development in the proposed Garden Village at Tasley is concerned, are supported. The inclusion of employment land and community facilities and open amenity land in the project is also supported as this will ensure a sustainable development.

(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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(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)

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

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Office Use Only	Part A Reference:
	Part B Reference:

Signature: RJ Turner

Date: 01/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP8"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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 checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

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<p>Policy SP8: Managing Development in Community Hubs.</p> <p>Stanmore is not identified as a Community Hub and thus is subject to Policy SP10: Development in the Countryside. It is not shown as being enclosed with the development boundary for Bridgnorth. Proposals for development in Community Hubs where some development might be expected in line with Policy SP8 are not applicable to Stanmore.</p> <p>Policies SP2 and SP10 indicate that development in the rural area will be focussed on Community Hubs and Community Clusters and the proposed development at Stanmore conflicts with this policy. The proposed development at Stanmore, that is 11.5ha of employment land, will not take place in a Community Hub and so is neither justified nor evidenced and will not be effective in achieving the aims of the Local Plan.</p>

(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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The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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)

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

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

RJ Turner

Date:

01/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
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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:	<input type="text" value="SP9"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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 checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

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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.

Policy SP9: Managing Development in Community Clusters

Stanmore is not identified as a Community Cluster and thus is subject to Policy 10: Development in the Countryside. It is not shown as being enclosed with the development boundary for Bridgnorth. Proposals for development in Community Hubs where some development might be expected in line with Policy SP8 are not applicable to Stanmore.

Policies SP2 and SP10 indicate that development in the rural area will be focussed on Community Hubs and Community Clusters and the proposed development at Stanmore conflicts with this policy. The proposed

development at Stanmore, that is, 11.5 ha of employment land, will not take place in a Community Cluster and so is neither justified nor evidenced and will not be effective in achieving the aims of the Local 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.

The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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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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:

Office Use Only	Part A Reference:
	Part B Reference:

Save Bridgnorth Greenbelt can bring a local perspective, and represent the views of local residents. This is particularly important because local people feel ignored by Shropshire Council, and feel they have not been adequately represented by their parish councils and county councillors. As per our covering letter, Save Bridgnorth Greenbelt conducted an opt-in exercise, and very many local residents gave us express permission to represent their views in both the consultation and examination.

(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:

RJ Turner

Date:

01/02/2021

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.

Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP10"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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.

<p>Policy SP10: Managing Development in the Countryside</p> <p>Plan is unsound and not in compliance with national policy.</p> <p>The policy is in conflict with the aims of other policies contained in the Local Plan.</p> <p>Policy SP10.1 indicates that the Council will seek to direct development to Strategic, Principal or Key Centres and new Strategic Settlements. In the rural area, Community Hubs and Community Clusters will be identified as a focus for new development, whilst fostering appropriate rural employment opportunities, subject to further controls over development that apply to the Green Belt, the AONB and other designated areas.</p> <p>Policy SP10.2 and .3 say that employment and business development (amongst others) in the rural area will be considered against national policy and other relevant Local Plan policies,</p>

recognising the need to meet rural economic and community needs sustainable employment in the countryside, will be positively considered where it maintains or enhances countryside vitality and character, and which are consistent with national Green Belt policy, and which relate to,

- i. small scale new economic diversification including farm diversification projects,
- ii. the retention of an existing established business (unless relocation to a settlement or established employment location is a better option),
- iii. agricultural, horticultural, forestry or mineral related development,
- iv. rural tourism, leisure or recreational proposals,
- v. community uses,
- vi. re-use of redundant or disused buildings.

The Local Plan proposes an allocation of some 11.5 ha of employment land at Stanmore, which will encroach on open countryside and which is designated Green Belt. The land concerned is not within a Strategic, Principal or Key Centre or a Strategic Settlement, and thus is regarded as being located in the rural area. Further, it is not located in, or even close to, any Community Hub or Community Cluster.

The proposal does not fall into ANY of the categories of development that might be acceptable in the green belt, as set out in Policy SP10.3. The proposed allocations at Stanmore are unjustified, not evidenced and would be in conflict with the aims of Policy SP10.

The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area's objectively assessed needs and should be based on proportionate evidence. It does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

(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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The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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:

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

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

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

Save Bridgnorth Greenbelt can bring a local perspective, and represent the views of local residents. This is particularly important because local people feel ignored by Shropshire Council, and feel they have not been adequately represented by their parish councils and county councillors. As per our covering letter, Save Bridgnorth Greenbelt conducted an opt-in exercise, and very many local residents gave us express permission to represent their views in both the consultation and examination.

(Please continue on a separate sheet if necessary)

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Signature: RJ Turner

Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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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:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP11"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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.

Policy SP11: Green Belt and Safeguarded Land

Plan is **unsound and not in compliance with national policy**.

The Plan purports to support restrictions on development in the Green Belt in Policy SP11, but then goes on to propose in Policy S3 that some 11.5 ha of land at Stanmore should be removed from the Green Belt in order to allow unidentified employment uses. The justification for this proposal is far from clear, and unless there is specific exceptional need for this development, the land should not be removed from the Green Belt.

Policy SP11.3 says that the Green Belt will be protected against inappropriate development, as defined by national policy. The National Planning Policy Framework (NPPF) says, at para. 133, that the "fundamental

aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

At para. 143 the NPPF says that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. It follows that “inappropriate development” would be anything which would detract from the fundamental functions of green belts, that, is, anything that would affect their openness or their permanence.

NPPF para 145 says that local planning authorities should regard the construction of new buildings as being inappropriate in a Green Belt, unless they are:

- i. buildings for agriculture or forestry,
- ii. provision of facilities for outdoor sports or recreation, cemeteries, or allotments,
- iii. extensions or alterations to an existing building as long as the additions are not disproportionate to the size of the existing building,
- iv. a replacement for an existing building provided it is not materially larger than the original,
- v. limited infilling in a village,
- vi. affordable housing,
- vii. redevelopment if previously developed land that does not substantially harm the openness of the locality.

These, of course, are requirements for the consideration of a planning application, but the proposed extension to the Stanmore Industrial Estate complies with none of these criteria. The effect of Policy SP11 and the Policies Map would be to remove that land at Stanmore that is proposed to be allocated for employment at Stanmore from the Green Belt and thus it would not be necessary, in future, to demonstrate ‘very special circumstances’ in the event that future planning applications are submitted. This is not made clear in Policy SP11, or the following explanatory paragraphs, but ought to be.

Policy SP11 indicates that the extent of the Green Belt within Shropshire is shown on the Policies Map. The policy goes on to say that (amongst others) the Industrial Estate at Stanmore is excluded from the Green Belt.

The Policies Map shows both the existing Industrial Estate at Stanmore and the proposed 11.5 ha of land that the Plan proposes to allocate for employment uses, as being excluded from the Green Belt. This is misleading. The existing Stanmore Industrial Estate is excluded from the Green Belt, but, at present, the land that is intended to be allocated for employment development in the Local Plan is included within the Green Belt. The text of Policy SP11 and the Policies Map should make this difference clear.

As the land is Green Belt at present, it is necessary to demonstrate “exceptional circumstances” in order to justify the removal of the land from Green Belt designation. The land, of course, is also allocated as ‘Countryside’ to which Policy SP9 would also apply, irrespective of whether the land is within the Green Belt or not.

The Council produced, in December 2020, a document entitled “Green Belt Exceptional Circumstances Statement”. Being produced so late in the Local Plan process, it appears likely that it was aimed at suggesting why sites already identified in the Plan for development had been chosen in the first place and should remain in the Plan, rather than being the basis on which such decisions could be made.

In terms of the Bridgnorth section of the document, which specifically relates to the proposed extensions to the Stanmore Industrial Estate, the Council notes at para. 7.10 that there are “very specific circumstances which have delayed the progression of the main employment allocations in the town”, without explaining what those circumstances are, how they could be rectified. The Council considers it “likely” that the availability of land was one of the factors that influenced the rate of delivery, but no evidence is presented to substantiate that possibility or explain why the significant areas allocated in the earlier (and current) version of the Local Plan had not been brought forward.

Office Use Only	Part A Reference:
	Part B Reference:

The “exceptional circumstances” identified in the Council’s document of December 2020, are:

- i. Supporting the Role of Stanmore Industrial Estate,
- ii. Supporting the medium to long term needs of existing businesses,
- iii. Attracting new businesses, particularly those in the engineering and advanced manufacturing sector.
- iv. Supporting the Strategic Role of Bridgnorth,
- v. Supporting the Aspirations of the Economic Growth Strategy.

None of these are, in themselves, exceptional circumstances – there must be many areas of land in the Country that such (or similar) considerations might apply to. There is no detailed evidence that these issues have caused, or will cause future, problems, and no explanation of why these considerations could be not satisfied elsewhere on sites that do not lie in the green belt, have been advanced in the document.

No exceptional circumstances were advanced in the Regulation 18 consultation document that would justify taking 11.5 ha of land out of the Green Belt. That document refers, in paras 4.214 to 4.218 to a Green Belt Review that the Council commissioned in 2017 – 2018. This Review concluded that the overall function of the Green Belt would not be harmed if certain areas of land were to be excluded. That, however, does not constitute an exceptional circumstance, it is no more than an assessment of the level of harm that might occur to the Green Belt, not an assessment of whether there are any exceptional circumstances. The conclusions reached by that Review could be levelled at large areas of green belt all over the Country, and do not indicate that the Stanmore land is in any way less harmful than other areas; it does not identify anything exceptional about the land.

Nevertheless, the land included in the proposed allocation for employment uses falls into two separate parcels of land assessed in the Green Belt Review. In the case of that land opposite the Hobbins, it was assessed that it made a strong contribution towards safeguarding the countryside from encroachment, and the land running to the north east of the current Stanmore Industrial Estate would have a moderate contribution towards safeguarding the countryside from encroachment.

The potential for adversely affecting the openness of the Green Belt, one of the fundamental objectives of the Green Belt was not assessed in any of the parcels assessed in the study, but clearly, as these are currently undeveloped sites in a rural area, any buildings erected on them are going to adversely affect the openness of the area. The results of the assessment, then, do not create an “exceptional circumstance” that would justify the removal of the sites from the Green Belt.

The proposal has long term implications for the green belt. No exceptional circumstances, either in terms of,

- a) imperative or urgent need for additional employment land in Stanmore, the Parish of Worfield (in which the proposed industrial extensions are located) or in Bridgnorth town, or
- b) because a particular employment operator is in need of additional land adjoining an existing operation that cannot be moved elsewhere, or
- c) that an operator has special requirements that cannot be met anywhere other than on the proposed allocated sites,

have been advanced to justify why the land should the land be allocated in the Local Plan. So, at the next Local Plan Review, the same arguments could be advanced with reasonable expectation that further incursions into the green belt would be approved. There would be no need to advance any other circumstances in addition to those advanced at the present time, and thus further losses of green belt might be secured.

Case law has established that the mere suitability of land for a particular use does not on its own constitute exceptional circumstances. The Court of Appeal, in the case of *Gallagher Homes Ltd v Solihull DC [2014]*

Office Use Only	Part A Reference:
	Part B Reference:

EWCA 1610, ruled that “The fact that a particular site ... happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt” (at para 36). By the same logic, simply because the removal of a plot of land would not harm the wider Green Belt function does not itself constitute an exceptional circumstance that would justify an allocation for employment development.

No evidence has been advanced to demonstrate that all the land and buildings at Stanmore have been developed and let; indeed, there are several buildings that are empty, and areas of land that have never been developed for commercial purposes.

Further, no evidence has been advanced that would justify the allocation of 11.5ha of land, or why two separate parcels of land have been identified. The proposed extensions are at opposite ends of the existing employment estate, and both, obviously, stretch into green belt. There is no evidence that this amount of land is required to meet any specific purpose, or to help any existing operator expand, or that a new operator is waiting for more land to become available in order to move to the Estate.

The allocations proposed for employment land at Stanmore are, then, unjustified and unevidenced. There is no guarantee that the land will actually be delivered. The proposal runs contrary to Government guidance set out in the National Planning Policy Framework. Taken as a whole the proposal is unsustainable.

The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area’s objectively assessed needs and should be based on proportionate evidence. It does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

(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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The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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

Office Use Only	Part A Reference:
	Part B Reference:

modification(s). You should not assume that you will have a further opportunity to make submissions.

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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)

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

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Signature: RJ Turner

Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
------------------------	-------------------------------------------

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:	<input type="text" value="SP12"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies Map:	<input type="text" value="Bridgnorth"/>
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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.

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Policy SP12: Shropshire's Economic Growth Strategy

Plan is **unsound**.

Again there is conflict with other policies in the Plan. The Policy will not be effective. As an example, Policy SP12.3 says that economic growth and investment will be supported in

- i. Shrewsbury,
- ii. Principal and Key Centres,
- iii. Strategic Corridors, Settlement and Sites,
- iv. Community Hubs,

- v. Community Clusters and the Countryside through windfall development where the location, scale, land use and impacts of the proposal will conform with existing land uses, settlement form and environmental qualities in accordance with relevant Local Plan policies.

However, the Plan proposes the allocation of two areas of land, totalling 11.5 ha, at Stanmore. The sites are not situated in Shrewsbury, Principal or Key Centres, the Strategic Corridors, Settlements or Sites, Community Hubs or Community Clusters. They are, though, located in open countryside, on Green Belt land, adjacent to an existing isolated Industrial Estate, and in agricultural use.

The proposal thus fulfils none of the criteria mentioned above, and so the proposed allocation would be in conflict with Policy SP12.3.

The development proposal at Stanmore is not evidenced or justified and, given the amount of land at Stanmore that has remained undeveloped, there is no certainty of delivery.

The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area's objectively assessed needs and should be based on proportionate evidence. It does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

The proposed development at Stanmore should be deleted from the Plan in order to ensure compliance with Policy SP10.

(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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The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

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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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	Part B Reference:

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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)

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

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Signature: RJ Turner

Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Rebecca Turner, Save Bridgnorth Greenbelt
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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:	<input type="text" value="SP13"/>	Site:	<input type="text" value="P58a and STC002"/>	Policies and Map:	<input type="text" value="Bridgnorth"/>
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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.

<p>Policy SP13: Delivering Sustainable Economic Growth and Enterprise</p> <p>Plan is unsound.</p> <p>Policy 13 is not fully evidenced or justified, and conflicts with the aims of other policies. As an example:</p> <p>The justification for 300 ha of land to be allocated for employment use is questioned. This would equate to the delivery of around 14 ha every year throughout the Plan period. That is a tall order, indeed, when, in the period 2016 – 2019 a yearly build rate of only 10.7 ha of employment land has been delivered. There is already a shortfall to make up.</p> <p>No particular factors are evidenced as guaranteeing an increase in need for industrial land in the plan period 2016 – 2038. This lack of delivery has not been caused by lack of sites or</p>

planning permissions, as land on existing employment areas, as committed sites, and in "Saved" allocations amounts to 239 ha, which in theory, was readily developable. (Figures taken from Appendix 6 of the of the Local Plan Review consultation document). It does not appear that the figure of 300 ha of employment land is likely to be delivered in the plan period and there is little need for the 142 ha of newly allocated employment land.

Policy SP13.2 says that a development proposal for employment will predominantly comprise Class B uses (though certain others – sui generis, E, C1, C2, C2A) would be appropriate. Policy SP13.3.d says the proposals should "satisfy the requirements of national and local policies especially to protect the Green Belt except where there are very special circumstances for development".

The land proposed in the Local Plan consultation document for employment at Stanmore is located in the Green Belt, and an allocation for the use of the land for employment would clearly be in conflict with Policy SP13.3.d, and no "very special circumstance" has been advanced. The proposed allocation for employment development at Stanmore appears to be a means of side-stepping the requirement laid out in policy SP13.3.d.

The NPPF says at para 35 that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. To be sound they should seek to meet the area's objectively assessed needs and should be based on proportionate evidence. It does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.

(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.

The two allocations for development at Stanmore - Site No's P58a and STC002 - should be deleted and the land should remain designated green belt.

(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.

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)?

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:

Save Bridgnorth Greenbelt can bring a local perspective, and represent the views of local residents. This is particularly important because local people feel ignored by Shropshire Council, and feel they have not been adequately represented by their parish councils and county councillors. As per our covering letter, Save Bridgnorth Greenbelt conducted an opt-in exercise, and very many local residents gave us express permission to represent their views in both the consultation and examination.

(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: RJ Turner

Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:



Mr Eddie West
Planning Policy & Strategy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

25th February 2021

Dear Mr West

**SHROPSHIRE LOCAL PLAN REVIEW – REGULATION 19 CONSULTATION, PRO-FORMA
RESIDENT RESPONSES VIA SBGB**

Please find enclosed pro-forma consultation responses from local residents who are supporters of Save Bridgnorth Greenbelt. These have been generated via public appeal on social media, through our email mailing list, and on our website. See: <https://savebridgnorthgreenbelt.co.uk/urgent-complete-the-consultation/>

Local residents were asked to either:

- a) Collect a hardcopy form and fill it in by hand and then either post it back to you directly themselves;
- b) Return the hardcopy form to us, so that we could courier it to you (enclosed with this letter);
- c) Download electronic versions of Part A and Part B forms from our website to either fill in by hand and post to you, return to us for us to send, or to email to you directly.

Stats from our website show that 74 people have downloaded the forms electronically, although we have no way of knowing whether they then emailed or posted them to you, or whether they printed more than one set of forms for other members of their household. We printed 100 hard copy forms. Obviously, the consultation runs for another day from the date of this letter, so we cannot yet know the final number of form downloads until the consultation is closed.

Taken together, these forms represent the comments and objections of our supporters – local residents. These are in addition to the more detailed and official submission from Save Bridgnorth Greenbelt that will be sent to you under separate cover tomorrow. Local people were keen to register their objection to the allocations at Stanmore, but given the complexity of the consultation for the layman, our inability to hold meetings or workshops offering guidance due to the pandemic, the narrowness of the ‘soundness’ argument, and the requirement to fill in a new Part B form for each comment – which together render the consultation incomprehensible for the average person – we decided the best course of action was to create a pro-forma response in simple language that the ordinary resident can easily understand.


Further, Save Bridgnorth Greenbelt has sought permission from local residents to represent them, and make arguments and speak on their behalf in the Regulation 19 consultation, and at the Examination in Public. This was an opt-in exercise conducted by email, paper form and on social media i.e. residents were asked to contact us to give us permission explicitly. We have had a large number of responses. Final numbers and details of that exercise will be outlined in SBGB’s official consultation response to follow.

Therefore, where residents have indicated in questions Q6 and Q7 that they would like to be invited to Examination Hearings, because,

“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 Parish and County Council officials 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.”

it should be taken to mean that they would like – and have given express permission to – Save Bridgnorth Greenbelt and the professionals supporting us to make those arguments and representations on their behalf. This is especially important due to the fact that since 2018 residents have suffered disgracefully hostile treatment by their parish council, and non-existent representation from their local County Councillors, and thus the Statement of Community Involvement has not been adhered to.

Yours sincerely


Rebecca Turner
Campaign Manager
Save Bridgnorth Greenbelt
Enc – pro-forma resident consultation responses