

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

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	Name and Organisation:	MR	DAVID	FERRIDAY	,
Q	1. To which document	does this	representa	tion relate?	•
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	B. Sound		Ye	s: 🔲	No: 🗹
	C. Compliant with the Duty	•	rate Ye	s: 🔲	No:
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	and Policy SP11 the land from G strated. There so the proposal	sets out to p Green Belt pr is no indicati appears to ot subject to	protect the Gree otection withou on of which bus be a device to the limitations	n Belt. The propose t any exceptional c inesses might wish ensure that future imposed by Policy Si	re located in the Green Belt d allocation would remove ircumstance being demon- to locate at Stanmore, and development proposals at P11, that is, that proposals
	National policy i	s to protect g	reen belts from	'inappropriate devel	dance with national policy. opment'. Inappropriate de- al functions of green belts,

which are to preserve their openness and to ensure their permanence. The National Planning Policy Framework says, at para 145, that local planning authorities should regard the construction of buildings as being "inappropriate" on a green belt, unless they are for certain, specified, uses - none of which include new development for industrial purposes. The release of 11.5ha of land from the Green Belt at Stanmore for use for industrial or storage purposes, and the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites. The proposed release of land from the green belt has not been justified, and the need for the land to be made available for employment development has not been evidenced. It is likely that, if approved, this allocation would be used for further unjustified incursions into the green belt in the future. (Please continue on a separate sheet if necessary) Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above. 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. No, I do not wish to participate in hearing session(s) Yes, I wish to participate in hearing session(s)

(Please tick one box)

Office Use Only	Part A Reference:	
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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.

(Please continue on a separate sheet if necessary)

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Signature:	Date:	22/2/21



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Name and Organisation	on: /	MR	DAVI	D	FERR 12	DAY		
Q1. To which docum	ent does	this	represe	ntatio	on relate?	ir		
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Stanmore area, have gone to great lengths in the past to preserve this situation.

Policy SP10 of the Local Plan Review proposes to restrict economic development in rural areas in line with national guidance. Policy SP10 says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. There is no guarantee that the proposed allocations will produce that effect, so the proposed allocations are an attempt to side-step such limitations for future developers. There is no reason why such allocations should be made, the countryside should continue to be protected.

	The reasons why this area of countryside should not be protected as the majority of the rest of the rural area of the Councy are, have not been justified and the need for the proposed allocation has not been properly evidenced.
	(Please continue on a separate sheet if necessary
Regu	Please set out the modification(s) you consider necessary to make the lation 19: Pre-Submission Draft of the Shropshire Local Plan legally pliant and sound, in respect of any legal compliance or soundness matters have identified at Q4 above.
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	(Please tick one box)
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	Office Use Only Part A Reference:

Part B Reference:

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Signature:

Shropshire Council Local Plan Reg 19 Consultation – Stanmore <u>Deadline 26th February 2021</u> *Guide to submitting your comments*



Here we go again! Let's save Bridgnorth's Greenbelt – complete the Reg 19 consultation, it takes just two minutes!

Shropshire Council are currently running what is called a Regulation 19 – or 'Pre-Submission Draft' - Consultation. This follows September's Reg 18 ('Preferred Sites') Consultation. Unsurprisingly, Shropshire Council has taken no notice of objections and they are pressing ahead regardless. The Plan contained in this current consultation is what Shropshire Council intends to submit to the Secretary of State. The plan will then be subject to an 'Examination in Public' and a Government Inspector will hold hearings to decide whether Shropshire Council can adopt it. What we all say now will be used by the Inspector as part of their deliberations.

Thanks to the community's herculean efforts, the residential plans for a "Garden Village" at Stanmore have been dropped. This is a massive win for the protection of our greenbelt. However, we must keep our foot on the gas by getting our consultation responses in <u>before the deadline of 5pm on 26th February 2021</u>.

This consultation is extremely complicated, and hard to understand. Worse, because it's a 'Reg 19' we can only make 'soundness' arguments – this has a very specific meaning in planning policy and law. Like before, we've pre-filled the consultation for you – all you've got to do is sign and return.

Instructions:

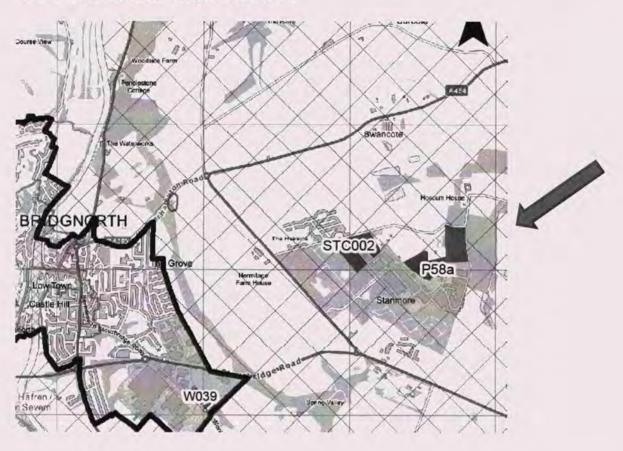
- Fill in the Part A form with your name and contact details in the 'personal' column (ignore the deadline date, it's since been extended to 26th Feb)
- Fill in your name on each sheet of the Part B forms (5 in all) where it says PART B
 REPRESENTATION and SIGN AND DATE it at the bottom make sure you do this for all 5
 forms.
- Don't worry about Q6 and Q7 if you get invited to Examination hearings, you'll just be able
 to say Save Bridgnorth Greenbelt represent you instead; our professionals will make
 arguments on your behalf.
- Drop your completed forms into the box in the shop at Worfield Garage by 24th February
- Or post your form back to Shropshire Council <u>making sure it will arrive by 26th February</u>
 Posting to:

Shropshire Council
Planning Policy & Strategy Team
Shirehall, Abbey Foregate
Shrewsbury
SY2 6ND

If you need more forms, you can pick up a blank form from Worfield Garage, or they are available on our website www.savebridgnorthgreenbelt.co.uk

What are the plans for Stanmore?

In this final draft version of the plan, Shropshire Council still wants to allocate two pieces of land (11.5ha in total) to expand Stanmore Industrial Estate – one right next the Hobbins and the country park, and the other behind Stanmore estate and back towards Hoccum. This is greenbelt. These allocations are still against the rules, and there is no 'exceptional circumstances' argument for greenbelt release. Shropshire Council's evidence and justifications for allocating more employment land (their economic argument) in Bridgnorth generally, and Stanmore specifically are extremely weak to non-existent also. It's really important that we keep making the argument that these greenbelt allocations are unjustified and say that pressing ahead with them will jeopardise the 'soundness' of the entire Shropshire Local Plan.



For those that want more detail, you can find Shropshire Council's proposals, plan and evidence base here: https://shropshire.gov.uk/get-involved/reg-19-pre-submission-draft-local-plan/#

Bridgnorth maps are here: https://shropshire.gov.uk/media/16756/s3-bridgnorth-place-plan-area-inset-maps.pdf

And you can read Shropshire Council's (terrible) exceptional circumstances argument for greenbelt release at Stanmore from page 46 here (this is the key argument we need to demolish): https://shropshire.gov.uk/media/16828/green-belt-revised-exceptional-circumstances-statement-december-2020.pdf

A detailed report explaining why Shropshire Council decided to drop Stanmore and opt for Tasley can be found here: https://shropshire.gov.uk/media/16705/bridgnorth-development-options-assessment-updated.pdf

Thank you!



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B. Sound					Yes:		No:	$\overline{\checkmark}$	
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	The Local Plan I and 49 ha of en in Appendix 6: I indicates that o 37.7 ha to be p Plan does not e	nployme mployn i total o rovided	ent land nent Do f 40.5 in Brid	d in Brid evelopm ha of la gnorth.	gnorth. T ent Guide ind is to b Clearly th	he Strategic L dines and Emp e allocated in here is a discre	and Suppi loyment L the Place pancy in t	ly 2016 – and Sup _l Plan An the figure	2038 set out oly, however, ea, with only es. The Local

The discrepancy appears to be around the amou uses at Stanmore. It does not appear that the j	
Policy S3.1 is not properly justified or evidence positive and robust predictions of future requipolaries ployment land.	
Q5. Please set out the modification(s) you con Regulation 19: Pre-Submission Draft of the Sh compliant and sound, in respect of any legal control you have identified at Q4 above.	ropshire Local Plan legally
Please note that non-compliance with the duty to co-operate examination. You will need to say why each modification with the Shropshire Local Plan legally compliant or soun forward your suggested revised wording of any policy or telegraphs.	ill make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put
Sites STC002 and P58a – allocated for employment devideleted from the Plan. There is no requirement for ar	
	I
(Please co	ontinue on a separate sheet if necessary)
Please note: In your representation you should provide supporting information necessary to support your representation(s). You should not assume that you will has submissions.	sentation and your suggested
After this stage, further submissions may only be a based on the matters and issues he or she identified	
Q6. If your representation is seeking a modific 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	· · ·
session(s), you may be asked at a later point to confirm	
No, I do not wish to participate in hearing session	on(s)
Yes, I wish to participate in hearing session(s)	
(Please tick one box)	
Q7. If you wish to participate in the hearing so you consider this to be necessary:	ession(s), please outline why
Office Lice Only	Part A Reference:

Part B Reference:

There has been considerable pressure placed on nearby residents to the proposed sites to accept the proposals put forward in the various drafts of the Local Plan Review, and they have not been adequately represented by locally elected Paarish and County Council official and Members. It is considered essential that the wishes of local people, who will be those most affected by the proposed development, should be heard.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Date: 22/2/21



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).

Name an	d Organisatio	n:	DAVID	FERK	LIDAY			
Q1. To wh	ich docume	ent does	this repre	sentatio	on relate?			
Regul	ation 19: Pre	-Submissio	on Draft of th	e Shrops	hire Local I	Plan		
Susta Local	inability Appr Plan	aisal of the	Regulation	19: Pre-5	Submission	Draft of	the Shro	pshire
☐ Shrop	ats Regulation shire Local Pl se tick one bo	an	nent of the R	egulation	19: Pre-S	ubmissio	n Draft o	f the
Q2. To wh	ich part of	the docu	ment doe	s this re	presenta	tion re	late?	
Paragraph:	Appendix 6	Policy:	S3.1	Site:	STC002/F	58a	Policies Map:	3
	u consider e Local Pla		lation 19:	Pre-Su	bmission	Draft o	of the	
	compliant			Yes:		No:		
B. Sound				Yes:		No:		
	iant with the		-operate	Yes:		No:		
Draft of the fails to co	e give detaine Shropshimply with to support the shire Local Placomments.	ire Local the duty legal compl	Plan is no to co-oper liance or sour	t legally ate. Pleadness of	complia case be a the Regulat	nt or is s precis	e unsou se as po Pre-Subm	nd or ossible. ission Dra
	Appendix 6	indicates the	roposed alloc at there is a Pro it is very worr	eferred Site				

It seems unlikely that a recycling plant would be set up on a brand-new industrial estate in a new garden village as proposed for Tasley. This suggests that it might be set up in a location away from the main urban area – very possibly Stanmore. The sites proposed at Stanmore would, if the Review Plan is approved, be removed from Green Belt protection. However, they would still be <u>surrounded</u> by Green Belt and would be located in countryside where there is no need for such development. It is considered that such a location would, in any event, be an inappropriate location for recycling activities. There is already such an operation not far from Stanmore, towards Worfield, and within the Green Belt, which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.

The calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates that an "additional provision to address local circumstances" of 12 ha is needed. The precise reasons for needing this additional provision, and exactly how the figure of 12 ha has been arrived at is not given.

There is no "local circumstance" that would justify such a provision. This is evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate. If the local circumstance is so acute, these areas would have been developed/redeveloped, by now. The fact that, in the over 40 years that the Stanmore Business Park has been in operation, the existing land and buildings have never been fully developed and put to operational use, indicates that an additional 11.5 ha as the Plan proposes is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is that it will adversely affect the green belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

(Please continue on a separate sheet if necessary)

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

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sites STC002 and P58a	- allocated for employment development at Stanmore - should be
deleted from the Plan.	There is no requirement for an alternative site to be identified.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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 Offiy	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)	
	f you wish to part consider this to be	icipate in the hearing session(necessary:	s), please outline why
sites Revie and of	to accept the prope ew, and they have r County Council office	rable pressure placed on nearby rosals put forward in the various do not been adequately represented sial and Members. It is considered be those most affected by the presented	rafts of the Local Plan by locally elected Paarish ed essential that the wishes
	·	(Please continue on	a separate sheet if necessary)
those to con	who have indicated th	r will determine the most appropriate nat they wish to participate in hearing ticipate when the Inspector has identi	session(s). You may be asked
Signat	ure:		Date: 22/2/21