

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you wou Part B Representation Form(s). We have also published a separate Guidance Note to explain the terms used and to assist in making effec Part B: Representation Name and Organisation: 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? **Appendix Policies** Paragraph: Policy: S3.1 Site: STC002/P58 3 Map: Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

B. Sound Yes: No: V

C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

A. Legally compliant

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.

The note against the proposed allocation of employment land in Bridgmorth contained in Appendix 6 indicates that there is a Preferred Site for Recycling and Environmental Industries. This is not detailed, but it is very worrying.

Yes:

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)

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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)?

> Office Use Only Part A Reference:

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Q7. If	ou wish to participate in the hearing session(s), please outline why sider this to be necessary:
sites t Review Count	es been considerable pressure placed on nearby residents to the proposed accept the proposals put forward in the various drafts of the Local Plan and they have not been adequately represented by locally elected Paarish and Council official and Members. It is considered essential that the wishes of ople, who will be those most affected by the proposed development, should be
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Part B: Repres	sentat	ion					
Name and Organisation	;						
Q1. To which docur							
Regulation 19: Pre							
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Habitats Regulation Shropshire Local F	Plan	nent of the	Regulation	19: Pre-S	ubmissio	on Draft	of the
Q2. To which part o	f the doc	ument do	es this r	epresent	ation r	elate?	
Paragraph:	Policy:	SP11	Site:	STC002/P	58	Policies Map:	3
Q3. Do you conside Shropshire Local Pl	r the Reg an is:	ulation 1	9: Pre-S	ubmissio	n Draft	of the	
A. Legally compliant			Yes:		No:		
B. Sound			Yes:		No:	$\overline{\mathbf{V}}$	
C. Compliant with the		-operate	Yes:		No:		
Q4. Please give deta Draft of the Shrops fails to comply with If you wish to support the of the Shropshire Local Plase set out your comments.	the duty	l Plan is no to co-operation of the co-operati	ot legali erate. Pl nundness o	y compliance of the Regular	ant or i	is unso ise as p Pre-Subi	und or possible.
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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)

> Office Use Only Part A Reference:

(Please tick one box)

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Q2. To w	hich part of	the doc	ument do	es this i	epresentati	on re	late?	
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Q3. Do yo Shropshii	ou consider re Local Plan	the Reg	ulation 19	e: Pre-S	ubmission D	raft	of the	
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proposed allocation has not been properly evidenced.

(Please continue on a separate sheet if necessary)

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	No, I do not wish to participate in hearing session(s)
$ \sqrt{} $	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:

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.

Office Use Only Part A Reference:

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Signature:	(Q. Qquino)	Date: 2 /02/2027



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(Please continue on a separate sheet if necessary)

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The Policy is not based on sound evidence and is not justified as being a sound basis for the

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development of more detailed policies in the Plan.

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Signature:	(R Paysa)	Date: 21/02/2021



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Part B: Representation		
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Regulation 19: Pre-Submission Draft of th	ne Shropshire Local	Plan
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Q2. To which part of the document doe	es this represen	tation relate?
Paragraph: Policy: S3.1	Site: STC002/I	Policies Map: 3
Q3. Do you consider the Regulation 19 Shropshire Local Plan is:	: Pre-Submissio	n Draft of the
A. Legally compliant	Yes:	No:
B. Sound	Yes:	No: 🔽
C. Compliant with the Duty to Co-operate (Please tick as appropriate).	Yes:	No:
Q4. Please give details of why you cons Draft of the Shropshire Local Plan is no fails to comply with the duty to co-ope	t legally compli	iant or is unsound or
If you wish to support the legal compliance or sou of the Shropshire Local Plan or its compliance with set out your comments.	indness of the Reaul	ation 19: Pre-Submission Draft

being part of Bridgnorth town. This is not the case. The Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment. It is located in open countryside and does not form a natural extension to Bridgnorth.

The Local Plan Review Policy S3.1 indicates that the Bridgnorth area will deliver 1,800 houses and 49 ha of employment land in Bridgnorth. The Strategic Land Supply 2016 -2038 set out in Appendix 6: Employment Development Guidelines and Employment Land Supply, however, indicates that a total of 40.5 ha of land is to be allocated in the Place Plan Area, with only 37.7 ha to be provided in Bridgnorth. Clearly there is a discrepancy in the figures. The Local Plan does not explain why it is necessary to allocate 49 ha of employment land in Bridgnorth. The discrepancy appears to be around the amount of development proposed for employment uses at Stanmore. It does not appear that the figures support this allocation.

	Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
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