

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:	
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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:	Appendix 6	Policy:	S3.1	Site:	STC002/P58a	Policies Map:	3
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(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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The note against the proposed allocation of employment land in Bridgnorth 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.

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 surrounded 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.

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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.

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21-02-2021

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The sites proposed for employment development at Stanmore are located in the Green Belt and Policy SP11 sets out to protect the Green Belt. The proposed allocation would remove the land from Green Belt protection without any exceptional circumstance being demonstrated. There is no indication of which businesses might wish to locate at Stanmore, and so the proposal appears to be a device to ensure that future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, that is, that proposals have to demonstrate that 'very special circumstances' exist.

Policy SP11 says that the Green Belt will be protected in accordance with national policy. National policy is to protect green belts from 'inappropriate development'. Inappropriate development can be anything that detracts from the fundamental functions of green belts,

which are to preserve their openness and to ensure their permanence. The National Planning Policy Framework says, at para 145, that local planning authorities should regard the construction of buildings as being "inappropriate" on a green belt, unless they are for certain, specified, uses – none of which include new development for industrial purposes. The release of 11.5ha of land from the Green Belt at Stanmore for use for industrial or storage purposes, and the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites.

The proposed release of land from the green belt has not been justified, and the need for the land to be made available for employment development has not been evidenced. It is likely that, if approved, this allocation would be used for further unjustified incursions into the green belt in the future.

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The aims of this policy are not supported by, or conflict with, the aims of other policies in the Plan Review. In particular and in relation to the proposed industrial allocations at Stanmore, because such development would not "contribute to meeting local needs" or to "making settlements more sustainable" as Policy SP1 requires. The settlement at Stanmore is very small and does not require 11.5ha. of employment development to meet its needs or to become more sustainable.

The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the Plan.

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The sites proposed for employment development at Stanmore is situated in open countryside, and are accessed through a country park. The Council, and the local residents in the Stanmore area, have gone to great lengths in the past to preserve this situation.

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

The reasons why this area of countryside should not be protected as the majority of the rest of the rural area of the County are, have not been justified and the need for the proposed allocation has not been properly evidenced.

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Shropshire Council Local Plan Reg 19

Consultation – Stanmore

Deadline 26th February 2021

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 **before the deadline of 5pm on 26th February 2021.**

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:

1. 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)
2. 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.
3. 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.
4. Drop your completed forms into the box in the shop at Worfield Garage **by 24th February**
5. Or post your form back to Shropshire Council **making sure it will arrive by 26th February**

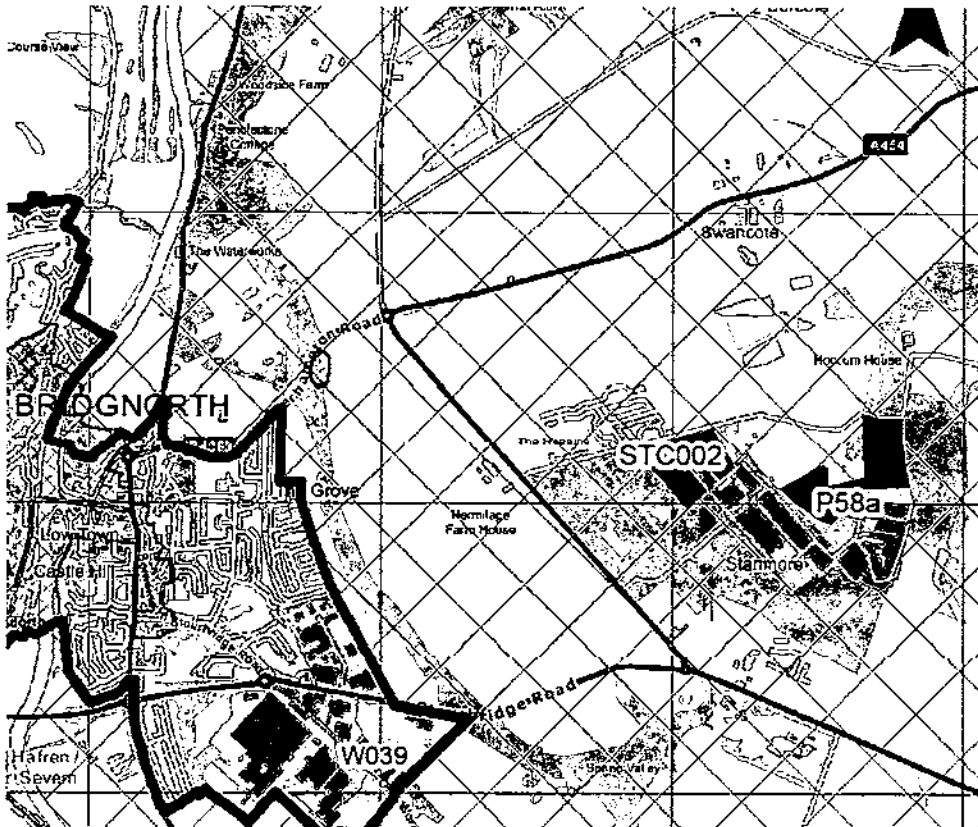
Posting to:

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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The proposed employment allocations at Stanmore are presented in the Local Plan Review as being necessary to serve the needs of Bridgnorth, and the Stanmore area is presented as 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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