Representation Form



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Part B: Representation

		IIIA	M Rec	MAG	13081			_
Q1. To w	hich docum	ent does t	his repres	sentat	ion relat	e?		
Regul	ation 19: Pre-	Submission	Draft of the	Shrops	shire Local	Plan		
Susta Local	inability Appra Plan	nisal of the R	egulation 1	9: Pre-	Submissio	n Draft o	f the Shro	opshire
Shrop	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of Shropshire Local Plan (Please tick one box)						of the	
Q2. To wi	hich part of	the docum	nent does	this r	epresen	tation r	elate?	
Paragraph:	Appendix 6	Policy:	53.1	Site:	STC002/	P58a	Policies Map:	3
	ou consider		ation 19:	Pre-S	ubmissio	on Draft	of the	
	re Local Pla	n is:			-		-	
A. Legally	compliant			Yes:		No:		
B. Sound				Yes:		No:		
	ant with the D rick as appropri		erate	Yes:		No:		
	e give detai	and the second sec	you consi	ider th	e Regula	ation 19	: Pre-S	ubm

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 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 <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 ac

ceptable 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.

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

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:

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: 23/2/2/

Office Use Only	Part A Reference:
	Part B Reference:



Representation Form

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Part B: Representation

Name and Organisation:	mr m k	ICHARDSon	
Q1. To which document of	does this rep	resentation relat	te?
Regulation 19: Pre-Subm	nission Draft of	the Shropshire Loca	l Plan
Sustainability Appraisal of Local Plan	of the Regulatio	n 19: Pre-Submissio	n Draft of the Shropshire
Habitats Regulations Ass Shropshire Local Plan (Please tick one box)	essment of the	Regulation 19: Pre-	Submission Draft of the
Q2. To which part of the	document do	oes this represen	tation relate?
Paragraph: Poli	cy: SP10	Site: STC002/	Policies 3 Map: 3
Q3. Do you consider the Shropshire Local Plan is:	the second se	9: Pre-Submissio	on Draft of the
A. Legally compliant		Yes:	No:
B. Sound		Yes:	No: 🗹
C. Compliant with the Duty to (Please tick as appropriate).		Yes:	No:
Q4. Please give details of	f why you co	nsider the Regul	ation 19: Pre-Submiss

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 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

		ral area of the Co on has not been			d and the need for	the pro-
			(Please of	continue on a se	eparate sheet if r	necessary
Regulation compliant	19: Pre-Su	in respect o	raft of the S	hropshire Lo	ssary to make ocal Plan legal or soundness	ly
examination. Draft of the S	You will need thropshire Loca	to say why each al Plan legally co	h modification w ompliant or sou	will make the Re and. It will be he	of modification at gulation 19: Pre- Ipful if you are ab s precise as possi	Submission le to put
					anmore – should e to be identified	

(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:

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

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

(Please continue on a separate sheet if necessary)

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Signature:

23/02/21 Date:

Office Use Only	Part A Reference:
	Part B Reference:



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Part B: Representation

ųι.	To which document does this repr	esentation relate?	
2	Regulation 19: Pre-Submission Draft of the	ne Shropshire Local Plan	t .
	Sustainability Appraisal of the Regulation Local Plan	19: Pre-Submission Dra	aft of the Shropshire
	Habitats Regulations Assessment of the R Shropshire Local Plan (Please tick one box)	egulation 19: Pre-Subm	nission Draft of the
Q2.	To which part of the document do	es this representation	on relate?
Parag	praph: Policy: SP1	Site: STC002/P58a	Policies Map: 3
	Do you consider the Regulation 19 opshire Local Plan is:	: Pre-Submission D	raft of the
	Legally compliant	Yes:	No:
Α.		-	No:
	Sound	Yes:	

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

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

(Please continue on a separate sheet if necessary)

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

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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)?

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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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(Please continue on a separate sheet if necessary)

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Signature:		Date: 23/2/21	
	Office Lise Only	Part A Reference:	
	Office Use Only	Part B Reference:	



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Part B: Representation

Name and Org	ganisation: MR M	RICHARDSON	
Q1. To which	document does this repr	esentation relat	te?
Regulation	19: Pre-Submission Draft of t	he Shropshire Loca	l Plan
Sustainabi	lity Appraisal of the Regulation	19: Pre-Submissio	on Draft of the Shropshire
 Shropshire 	egulations Assessment of the I Local Plan ick one box)	Regulation 19: Pre-	Submission Draft of the
Q2. To which	part of the document do	es this represen	tation relate?
aragraph:	Policy: SP11	Site: STC002/	Policies P58a Map: 3
Q3. Do you co Shropshire Lo	onsider the Regulation 19 ocal Plan is:): Pre-Submissio	on Draft of the
A. Legally com	pliant	Yes:	No:
B. Sound		Yes:	No:
	with the Duty to Co-operate s appropriate).	Yes:	No:
	and all a start and a start a start and		

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 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 Plan-

V

ning 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.

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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.

(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:

23/02/21 Date:

Office Use Only	Part A Reference:
	Part B Reference:

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Part B: Representation

Name and Organisation:	Micit	AEL RI	chhanden	
Q1. To which document	t does this repr	esentation rela	ate?	
Regulation 19: Pre-Sul	omission Draft of t	he Shropshire Loc	al Plan	
Sustainability Appraisa Local Plan	l of the Regulation	19: Pre-Submiss	ion Draft of the Shropshi	ire
Habitats Regulations A Shropshire Local Plan (Please tick one box)		Regulation 19: Pre	-Submission Draft of the	2
Q2. To which part of th	e document do	es this represe	ntation relate?	
Paragraph: Po	olicy: SP10	Site: STC002	2/P58a Policies 3 Map: 3	
Q3. Do you consider the Shropshire Local Plan is		: Pre-Submiss	ion Draft of the	
A. Legally compliant		Yes:	No:	
B. Sound		Yes:	No:	
C. Compliant with the Duty (Please tick as appropriate		Yes:	No:	
Q4. Please give details Draft of the Shropshire fails to comply with the If you wish to support the lega of the Shropshire Local Plan o set out your comments.	Local Plan is no duty to co-ope al compliance or sou	ot legally comp erate. Please be undness of the Reg	bliant or is unsound e as precise as possibulation 19: Pre-Submission	or ible. on Draft
The sites propos side, and are ac	cessed through a cou	intry park. The Cou	nmore is situated in open co ncil, and the local residents 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

	ne rural area of the Councy are, have not been justified and the need for the pro-
05. Please set ou	(Please continue on a separate sheet if necessary t the modification(s) you consider necessary to make the
Regulation 19: Pr compliant and so you have identifie Please note that non-c	e-Submission Draft of the Shropshire Local Plan legally und, in respect of any legal compliance or soundness matters and at Q4 above. Compliance with the duty to co-operate is incapable of modification at
Draft of the Shropshire forward your suggeste	need to say why each modification will make the Regulation 19: Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put d revised wording of any policy or text. Please be as precise as possible.
	Ba – allocated for employment development at Stanmore – should be . There is no requirement for an alternative site to be identified.

(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:

1

Date: 23/2/71

Office Use Only	Part A Reference:
	Part B Reference: