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Date: 24. 2. 21

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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?

Paragraph:		Policy: SP1	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:

• Legally compliant	Yes:			No:	
• Sound	Yes:			No:	
• 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 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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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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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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• Sound	Yes:	<input type="checkbox"/>	<input type="checkbox"/>	No:	<input type="checkbox"/>	<input type="checkbox"/>
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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.

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Q2. To which part of the document does this representation relate?

Paragraph h:	Policy: SP11	Site: STC002/P58a	Policies Map: 3
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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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Q2. To which part of the document does this representation relate?

Paragraph:	Policy: SP10	Site: STC002/P58a	Policies Map: 3
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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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Paragraph h:	Policy: S3.1	Site: STC002/P58a	Policies Map: 3
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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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