

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.

Pa	rt B:	Represe	ntat	ion						
Name and Organisation: Andrew J. Howard										
Q1 .	. To whi	ich documen	t doe	s this repr	esentat	ion rel	ate?			
$\overline{\checkmark}$	Regulat	ion 19: Pre-Su	bmissi	on Draft of t	he Shrops	shire Loc	cal Plan			
	Sustain Local P	ability Appraisa lan	al of th	e Regulation	19: Pre-9	Submiss	sion Draf	t of	the Shr	opshire
	Shrops	s Regulations A hire Local Plan se tick one box		ment of the I	Regulatior	19: Pre	e-Submi	ssior	n Draft	of the
Q2.	. To whi	ich part of th	ne doc	cument do	es this r	eprese	entatio	n re	late?	
Para	graph:	F	olicy:	S3.1	Site:	STC00	2/P58a	F	Policies Map:	3
_	_	consider the Local Plan	_	julation 19	9: Pre-Si	ubmiss	sion Dr	aft (of the	
	_	compliant			Yes:		ı	No:		
В.	Sound				Yes:		1	No:	\checkmark	
	•	nt with the Dut	•	o-operate	Yes:		1	No:		
Q4. Dra fail If you	Please Ift of th s to cor ou wish to ne Shrops	give details e Shropshire mply with the support the legal bire Local Plan is comments.	of wle Loca e duty	I Plan is n y to co-ope pliance or so	ot legal erate. Pl undness o	ly com lease b f the Re	pliant o e as pi gulation	or is reci: 19: F	s unso se as _l Pre-Sub	und or possible. mission Draft
	·	The proposed eas being necess being part of B rated from Brid and does not for The Local Plan houses and 49 2038 set out in Supply, however Area, with only	ary to s ridgnorth Ignorth rm a na Review ha of e n Appen rr, indica	erve the need th town. This by a steep w stural extensio Policy S3.1 employment lo dix 6: Employ ates that a tot	s of Bridgn is not the cooded esco in to Bridgn indicates to and in Brid iment Deve al of 40.5 h	orth, and case. The arpment. north. hat the gnorth. elopment na of land	I the Stan e Stanmo It is loo Bridgnort The Stra Guidelin I is to be o	more re ar cated h are tegic es ar	e area is ea is phy in oper ea will o Land Su nd Emplo ated in tl	presented as ysically sepa- n countryside deliver 1,800 upply 2016 – oyment Land he Place Plan

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 develop-

ment proposed for emplo port this allocation.	yment uses at Stanmo	ore. It does not appear that the figures sup-
	•	, and has not been prepared on the basis of ements and take-ups of employment or em-
Q5. Please set out the modific	•	ontinue on a separate sheet if necessary nsider necessary to make the
Regulation 19: Pre-Submissio	n Draft of the Sh ect of any legal o	
Please note that non-compliance with examination. You will need to say why	the duty to co-opera each modification w lly compliant or sour	ill make the Regulation 19: Pre-Submissiond. It will be helpful if you are able to put
Sites STC002 and P58a – allocated for deleted from the Plan. There is no	or employment dev	elopment at Stanmore – should be
	(Please co	ontinue on a separate sheet if necessary
Please note: In your representation supporting information necessary to modification(s). You should not assusubmissions.	support your repres	sentation and your suggested
After this stage, further submissibased on the matters and issues		
	shire Local Plan	cation to the Regulation 19: Pre- , do you consider it necessary to ?
-	de an initial indication	on of your wish to participate in hearing
No, I do not wish to participat	e in hearing session	n(s)
Yes, I wish to participate in h	earing session(s)	
(Please tick one box) Q7. If you wish to participate	in the hearing s	ession(s), please outline why
you consider this to be necess		(), []
	Office Use 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:	Andrew J. Howard	Date:	26/02/2021

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



Representation Form

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N	ame an	d Organisati	on:	Andr	ew J. Howar	d					
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	Regul	ation 19: Pro	e-Subn	nissi	on Draft of t	he Shrops	shire Lo	cal Plan			
	Susta Local		raisal (of th	e Regulation	19: Pre-	Submiss	sion Draf	t of	the Shr	opshire
	Shrop	ats Regulation shire Local F Sase tick one	Plan	sessr	ment of the F	Regulatior	19: Pr	e-Submi	ssioi	n Draft	of the
Q2.	. To wl	hich part o	of the	doc	cument do	es this ı	epres	entatio	n re	elate?	
Para	graph:		Poli	icy:	SP1	Site:	STC00	2/P58a		Policies Map:	
_	_	ou conside re Local Pl		_	julation 19	9: Pre-S	ubmis	sion Dr	aft	of the	
Α.	Legally	compliant				Yes:		1	No:		
В.	Sound					Yes:		J	No:	\checkmark	
	•	ant with the	•		o-operate	Yes:		I	No:		
Dra fail If yo of th	aft of to see to commend to see to see the see	he Shrops omply with to support th	hire L n the d e legal	oca duty com	I Plan is n y to co-ope pliance or so	ot legal erate. P undness o	ly com lease b	pliant o pe as pi egulation	or is reci 19:	s unso se as Pre-Sub	
	, - 3'	The aims the Plan F Stanmore, "making s Stanmore its needs o	Review. becaus settleme is very : or to bec is not b	In se sucents small come	y are not supp particular and th developmen more sustain and does not more sustaind on sound evid detailed policie	d in relation twould not able" as in require 12 able.	n to the ot "conti Policy Si 1.5ha. of is not jus	e proposed ribute to n P1 requir Femploym	d ind meeti es. nent d	lustrial d ing local The s developr	needs" or to ettlement at ment to meet

(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

Draft of the	n. You will need to say why each modification will re Shropshire Local Plan legally compliant or sound. Our suggested revised wording of any policy or text.	It will be helpful	if you are able to put
Sites STC	02 and P58a – allocated for employment develom the Plan. There is no requirement for an alt	ment at Stanm	ore – should be
	(Dlagge gard		
	•	•	te sheet if necessary)
supporting	te: In your representation you should provide suinformation necessary to support your represent in(s). You should not assume that you will have its.	tation and your	suggested
	stage, further submissions may only be ma the matters and issues he or she identifies		
Submiss participa	ur representation is seeking a modification of the Shropshire Local Plan, do te in examination hearing session(s)?	o you conside	er it necessary to
	e that while this will provide an initial indication o you may be asked at a later point to confirm yo		
No,	I do not wish to participate in hearing session(s)	
√ Yes	, I wish to participate in hearing session(s)		
•	ease tick one box)		
_	u wish to participate in the hearing ses: ider this to be necessary:	sion(s), pleas	e outline why
sites to a Review, a and Coun	been considerable pressure placed on near scept the proposals put forward in the various and they have not been adequately represently by Council official and Members. It is consi ecople, who will be those most affected by the heard.	us drafts of th ted by locally d dered essentia	e Local Plan elected Paarish Il that the wishes
	(Please continu	e on a separate	sheet if necessary)
those who	e: The Inspector will determine the most approp have indicated that they wish to participate in he your wish to participate when the Inspector has i	riate procedure aring session(s)	to adopt to hear You may be asked
Signature:	Andrew J.Howard	Date:	26/02/2021

Office Use Only

Part A Reference:

Part B Reference:



Representation Form

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Pa	rt B: Rep	reser	itation					
Na	Name and Organisation: Andrew J.Howard							
Q1.	To which do	cumen	t does this repr	esentati	ion rel	ate?		
$\overline{\checkmark}$	Regulation 19	: Pre-Sul	omission Draft of t	he Shrops	hire Loc	cal Plan		
	Sustainability Local Plan	Appraisa	l of the Regulation	19: Pre-9	Submiss	ion Draft o	of the Shr	opshire
	Habitats Regu Shropshire Lo (Please tick o	cal Plan	ssessment of the F	Regulation	19: Pre	e-Submissi	on Draft	of the
Q2.	To which pa	rt of th	e document do	es this r	eprese	entation	relate?	
Parag	graph:	P	olicy: SP10	Site:	STC00	2/P58a	Policies Map:	3
_	Do you cons		e Regulation 19 s:	9: Pre-Su	ubmiss	sion Draf	t of the	
Α.	Legally complia	nt		Yes:		No	: 🔲	
В.	Sound			Yes:		No	: 🗹	
	Compliant with Please tick as ap	·	•	Yes:		No	: 🔲	
Dra fail If you of th	of the Shrows to comply we wish to suppose	opshire with the rt the leg cal Plan o	of why you cor Local Plan is n e duty to co-ope al compliance or so r its compliance wit	ot legall erate. Pl undness of	y com ease b f the Reg	pliant or e as pre gulation 19	is unso cise as : Pre-Sub	und or possible. mission Draft
	side, a Stanm Policy eas in countr acter. propos There	nd are ac ore area, SP10 of th line with Tyside will There is	sed for employment of cessed through a country for the cessed through a country for the cessed through a country for the cessed through the cessed that the cessed through the cessed through the cessed for the cessed through through the cessed through through the cessed through t	untry park. engths in th proposes to Policy SP1 ney maintai ne proposed ot to side-s	The Coure past to restrict to says to or enhanced allocation tep such	uncil, and the preserve the economic de hat develope ance countrons will produintions	ne local resolis situation Levelopment propryside vital duce that for future	nt in rural ar- posals in the lity and char- effect, so the developers.

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 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.
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)
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.

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		_	
Signature:	Andrew J. Howard	Date:	26/02/2021

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



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Pai	rt B: Represer	ntation
Na	ame and Organisation:	Andrew J. Howard
Q1.	To which documen	t does this representation relate?
$\overline{\checkmark}$	Regulation 19: Pre-Su	bmission Draft of the Shropshire Local Plan
	Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire
	Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the
Q2.	To which part of th	ne document does this representation relate?
Parag	graph: P	Policy: SP11 Site: STC002/P58a Policies Map: 3
_	Do you consider the opshire Local Plan i	e Regulation 19: Pre-Submission Draft of the
	Legally compliant	Yes: No:
	- , .	
В.	Sound	Yes: ☐ No: ✔
C.	Compliant with the Dut	y to Co-operate Yes: No:
(1	Please tick as appropriat	te).
Dra fail: If you of th	of the Shropshire is to comply with the but wish to support the legal shropshire Local Plan cout your comments.	s of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or the duty to co-operate. Please be as precise as possible. If you can be a suppliance or soundness of the Regulation 19: Pre-Submission Draws or its compliance with the duty to co-operate, please also use this box is the suppliance with the duty to co-operate, please also use this box is the suppliance with the duty to co-operate, please also use this box is the suppliance with the duty to co-operate, please also use this box is the suppliance with the duty to co-operate, please also use this box is the suppliance with the duty to co-operate, please also use this box is the suppliance with the suppliance with the duty to co-operate.
	Belt and Policy move the land demonstrated. Stanmore, and proposals at St	osed for employment development at Stanmore are located in the Green SP11 sets out to protect the Green Belt. The proposed allocation would refrom Green Belt protection without any exceptional circumstance being There is no indication of which businesses might wish to locate at so the proposal appears to be a device to ensure that future development anmore are not subject to the limitations imposed by Policy SP11, that is, have to demonstrate that 'very special circumstances' exist.
	National policy	is that the Green Belt will be protected in accordance with national policy. is to protect green belts from 'inappropriate development'. Inappropriate an he anything that detracts from the fundamental functions of green helts.

which are to preserve their openness and to ensure their permanence. The National Plan-

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. 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)

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:
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.

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Signature:	Andrew J. Howard	Date:	26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



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Paı	t B: Represe	ntation					
Na	ame and Organisation:	Andrew Howard					
Q1.	To which documen	t does this repr	esentati	on relat	te?		
V	Regulation 19: Pre-Su	bmission Draft of th	e Shrops	hire Loca	l Plan		
	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
	Habitats Regulations A Shropshire Local Plan (Please tick one box)		egulation	19: Pre-	Submissio	n Draft o	f the
Q2.	To which part of the	ne document doe	s this r	epresen	itation r	elate?	
Parag	graph: Appendix 6	Policy: S3.1	Site:	STC002,	/P58a	Policies Map:	3
_	Do you consider thopshire Local Plan	_	: Pre-Sเ	ubmissio	on Draft	of the	
Α.	Legally compliant		Yes:		No:		
В.	Sound		Yes:		No:	\checkmark	
	Compliant with the Dut Please tick as appropria	•	Yes:		No:		
Dra fails If yo of th	Please give details ft of the Shropshire to comply with the u wish to support the lege Shropshire Local Plan out your comments.	e Local Plan is no e duty to co-ope al compliance or sou	ot legall rate. Pl undness of	y complease be	liant or i as preci lation 19:	s unsou ise as p Pre-Subn	ind or ossible. nission Drafi
	Appendix 6 ind tries. This is no It seems unliked a new garden v cation away fro Stanmore woul	st the proposed alloce icates that there is a let detailed, but it is very by that a recycling pland illage as proposed for own the main urban allow, if the Review Plandwould still be surrounce.	Preferred S worrying. It would be Tasley. T rea – very is approve led by Gred	Site for Rec e set up on This sugges possibly S d, be remo en Belt and	cycling and a brand-ne its that it m tanmore. oved from (d would be	Environme ew industr ight be se The sites p Green Belt located in	ial estate in t up in a lo- proposed at protection. countryside

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)

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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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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:
Office Use Only	Part B Reference:

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	e that while this will provide an initial indication o , you may be asked at a later point to confirm yo			
☐ No,	I do not wish to participate in hearing session(s)			
Yes	, I wish to participate in hearing session(s)			
(PI	lease tick one box)			
	ou wish to participate in the hearing sessifier this to be necessary:	sion(s), pleas	se outline why	
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.				
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Signature:	Andrew J. Howard	Date:	26/02/2021	
		_		