

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	: ROBERT,C.	TURNE	R		
1. To which docume	nt does this repre	esentatio	n relate?		
Regulation 19: Pre-	Submission Draft of t	he Shrops	hire Local Plan	i .	
Sustainability Appra	isal of the Regulation	19: Pre-S	Submission Dra	aft of	the Shropshire
Habitats Regulations Shropshire Local Pla (Please tick one box		Regulation	19: Pre-Subm	nissior	Draft of the
2. To which part of t	he document doe	s this re	presentatio	n rel	ate?
Paragraph:	Policy: S3.1	Site:	STC002/P58a		Policies Map: 3
3. Do you consider t		: Pre-Sul	bmission Dr	aft o	f the
Shropshire Local Plan A. Legally compliant	is:	Yes:		No:	
B. Sound		Yes:		No:	\square
C. Compliant with the D		Yes:		No:	
Q4. Please give detail Draft of the Shropshin ails to comply with the f you wish to support the least if the Shropshire Local Plant et out your comments.	e Local Plan is no ne duty to co-ope egal compliance or sou	ot legally rate. Ple indness of	compliant ase be as p the Regulation	or is recis 19: Pi	unsound or e as possible. re-Submission Dra
as being nec being part of rated from B does not for	d employment allocation essary to serve the need f Bridgnorth town. This ridgnorth by a steep won a natural extension to n Review Policy S3.1 ind	ls of Bridgno is not the c oded escarp Bridgnorth	orth, and the Sta case. The Stanm oment. It is loca	nmore nore ar ted in	e area is presented o ea is physically sep open countryside ar
and 49 ha of in Appendix 6 indicates tha 37.7 ha to be	employment land in Brid Employment Developm It a total of 40.5 ha of la Provided in Bridgnorth Texplain why it is necess	dgnorth. Th nent Guidel and is to be . Clearly the	e Strategic Land ines and Employ allocated in the ere is a discrepa	Suppl ment L Place ncy in t	y 2016 – 2038 set o and Supply, howeve Plan Area, with on the figures. The Loc

		int of development proposed for employment igures support this allocation.
		d, and has not been prepared on the basis of rements and take-ups of employment or em-
	(Please co	ntinue on a separate sheet if necessary,
Regulation 19: Pre-Submiss	ion Draft of the Sh pect of any legal c	sider necessary to make the ropshire Local Plan legally ompliance or soundness matters
Please note that non-compliance wit examination. You will need to say w	th the duty to co-operat hy each modification wi gally compliant or soun	ll make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put
	ed for employment dev	elopment at Stanmore – should be
	7	
	(Please co	ntinue on a separate sheet if necessary,
Please note: In your representation supporting information necessary modification(s). You should not assubmissions.	on you should provide to support your repres	succinctly all the evidence and entation and your suggested
After this stage, further submis based on the matters and issue		nade if invited by the Inspector, as for examination.
	opshire Local Plan	cation to the Regulation 19: Pre-
	vide an initial indicatio	n of your wish to participate in hearing
No, I do not wish to partic	ipate in hearing sessio	n(s)
Yes, I wish to participate in	n hearing session(s)	
(Please tick one box)		
	e in the hearing se	ession(s), please outline why
you consider this to be nece		
	Office Hee 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.

(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: 24(2(2))



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Part E	3: Represe	ntation					
Name a	and Organisation:	ROBERT.C.	TURNE	R			
21. To w	hich documen	t does this repr	esentatio	on relate	?	-3	
√ Reg	ulation 19: Pre-S	ubmission Draft of	the Shrops	hire Local	Plan		
	tainability Apprais al Plan	sal of the Regulation	n 19: Pre-S	Submissio	n Draft of	the Shro	pshire
☐ Shr	oitats Regulations opshire Local Plar ease tick one box		Regulation	19: Pre-S	Submissio	on Draft o	f the
2. To w	hich part of th	e document do	es this re	present	ation re	late?	-
Paragraph	:	Policy: SP11	Site:	STC002/	P58a	Policies Map:	3
	ou consider th	e Regulation 19	: Pre-Su	bmission	n Draft	of the	
	lly compliant		Yes:		No:		
B. Sour	nd		Yes:		No:	V	
	pliant with the Du	A CONTRACTOR OF THE PROPERTY O	Yes:		No:		
Draft of ails to of you wish of the Shro	the Shropshire comply with the to support the leg	of why you con Local Plan is no e duty to co-ope gal compliance or so or its compliance wit	ot legally erate. Ple undness of	compliance	ant or is as preci ation 19:	s unsou se as po Pre-Subm	nd or ossible. ission Drai
	and Policy SP2 the land from strated. The so the propos Stanmore are	nosed for employment 11 sets out to protect Green Belt protection Te is no indication of we Tal appears to be a d The not subject to the limenstrate that very spec	the Green B n without a which busine levice to en litations imp	elt. The properties of the pro	oposed all onal circun wish to lo uture deve licy SP11,	ocation wo nstance be cate at Sto elopment p	ould remove eing demon anmore, and proposals a
	National polic	ays that the Green Be y is to protect green be n be anything that de	elts from 'inc	appropriate	developm	ent'. Inapp	ropriate de

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.

(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.

rorward your suggested re	vised wording of any policy of text. Please be as precise as possible.
	 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)

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)
$ \sqrt{} $	Yes, I wish to participate in hearing session(s)
	(Please tick one box)

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

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 Inspecto	will determine the most appropriate procedure to adopt to hear
	at they wish to participate in hearing session(s). You may be asked icipate when the Inspector has identified the matters and issues for
examination.	apate mich the inspector has been med the matters and issues to
Signature:	Date: 24/2/21



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Part B: Representation

Name and Organisation:	ROBERTO	TUR	NER			
1. To which document	does this repre	sentatio	n relate?			
Regulation 19: Pre-Sul	omission Draft of th	ne Shropsh	ire Local Plan			
Sustainability Appraisa Local Plan	l of the Regulation	19: Pre-Si	ubmission Dra	ft of	the Shro	pshire
Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the R	egulation	19: Pre-Subm	issior	n Draft o	f the
2. To which part of the	document does	s this rep	presentatio	n rel	ate?	
aragraph: Po	olicy: SP1	Site:	STC002/P58a		Policies Map:	3
3. Do you consider the hropshire Local Plan is		Pre-Sub	mission Dra	aft o	f the	
A. Legally compliant		Yes:		No:		
B. Sound		Yes:		No:	$ \overline{\mathbf{V}} $	
C. Compliant with the Duty (Please tick as appropriate		Yes:		No:		
4. Please give details of the Shropshire ails to comply with the you wish to support the legate the Shropshire Local Plan or et out your comments.	Local Plan is no duty to co-oper I compliance or sour	t legally rate. Plea ndness of to	compliant of ase be as properties to the compliant of the complex of the complex of the complex of the compliant of the compl	ecis	e as po	nd or ossible. ission Dra
the Plan Reviev Stanmore, beca "making settlen	is policy are not suppo v. In particular and use such developmen nents more sustainable d does not require 11. e sustainable.	l in relation it would not le" as Policy	to the propose contribute to SP1 requires. T	ed ind meeti he se	lustrial al ing local i ttlement d	locations of needs" or t at Stanmor
	t based on sound evid more detailed policie			being	a sound i	basis for th

(Please continue on a separate sheet if necessary)

Regulat	ion 19: Pre-S	Submission Dra	aft of the Shro	pshire Local F	Plan legally
CONTRACTOR OF THE PARTY OF THE			any legal con	ipliance or so	undness matters
Please not examinati Draft of th	on. You will need ne Shropshire Lo	oliance with the du d to say why each cal Plan legally col		nake the Regulati It will be helpful i	on 19: Pre-Submission f you are able to put
			nployment develo		
					te sheet if necessary)
supportin	g information no ion(s). You sho	ecessary to suppo	should provide su ort your represen hat you will have	tation and your s	suggested
			may only be ma r she identifies		
Submiss particip	sion Draft of ate in exami	the Shropshire nation hearing	Local Plan, d session(s)?	o you conside	gulation 19: Pre- er it necessary to articipate in hearing
_			oint to confirm yo hearing session(s	and the same of th	rticipate.
=		rticipate in hearin		*	
-	es, I wish to par Please tick one b		ig session(s)		
Q7. If y	ou wish to pa		e hearing sess	sion(s), pleas	e outline why
There h sites to Review and Cou of local	as been considerate accept the property and they have anty Council of	derable pressur oposals put for e not been ade fficial and Meml		ous drafts of the nted by locally idered essentia	e Local Plan elected Paarish al that the wishes
those who	o have indicated n your wish to p	that they wish t	e the most appropo o participate in he	oriate procedure earing session(s)	e sheet if necessary) to adopt to hear . You may be asked atters and issues for
Signature	:			Date:	24/2/21
				Part A Referen	ce:

Only

Part B Reference:



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Part B: Representation

01.				*	t K			
£	To which docun	ent does	this repr	esentatio	on relate	e?		
V	Regulation 19: Pr	e-Submissi	on Draft of	the Shrops	hire Local	l Plan		
	Sustainability App Local Plan	oraisal of th	e Regulatio	n 19: Pre-S	Submissio	n Draft of	the Shro	pshire
	Habitats Regulation Shropshire Local (Please tick one in	Plan	nent of the	Regulation	19: Pre-	Submissio	n Draft o	of the
Q2.	To which part o	f the doc	ument do	es this re	present	tation re	late?	
Parag	graph:	Policy:	SP10	Site:	STC002/	P58a	Policies Map:	3
	Do you conside pshire Local Pl	the second secon	ulation 19	9: Pre-Su	bmissio	n Draft (of the	
Α.	Legally compliant			Yes:		No:		
В.	Sound			Yes:		No:	$ \overline{\mathbf{A}} $	
	Compliant with the		o-operate	Yes:		No:		
Draf fails If you of the	Please give deta t of the Shrops to comply with wish to support the Shropshire Local P at your comments.	hire Local the duty e legal comp	Plan is no to co-operations	ot legally erate. Ple undness of	complicase be the Regula	iant or is as precis ation 19: F	se as po Pre-Subm	nd or ossible. ission Draft
	The sites side, and	proposed for are accessed area, have g	through a c	ountry park.	The Coun	icil, and the	local res	idents in the
	eas in line tryside wi There is no allocation	O of the Local with national Il be allowed o guarantee to s are an atte hy such alloc	I guidance. I where they hat the prop mpt to side-	Policy SP10 s maintain or osed allocati step such lir	ays that de enhance c ions will pro nitations fo	evelopment ountryside oduce that e or future de	proposals vitality an effect, so t evelopers.	in the coun- d character. he proposed There is no

	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)
Regula	ease set out the modification(s) you consider necessary to make the ation 19: Pre-Submission Draft of the Shropshire Local Plan legally iant and sound, in respect of any legal compliance or soundness matters are identified at Q4 above.
Please n examina Draft of	note that non-compliance with the duty to co-operate is incapable of modification at attention. You will need to say why each modification will make the Regulation 19: Pre-Submission the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put your suggested revised wording of any policy or text. Please be as precise as possible.
	TC002 and P58a – allocated for employment development at Stanmore – should be d from the Plan. There is no requirement for an alternative site to be identified.
support	(Please continue on a separate sheet if necessary) note: In your representation you should provide succinctly all the evidence and ing information necessary to support your representation and your suggested ation(s). You should not assume that you will have a further opportunity to make sions.
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Please r	note that while this will provide an initial indication of your wish to participate in hearing (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)
$\overline{\mathbf{V}}$	Yes, I wish to participate in hearing session(s)
	(Please tick one box)
	you wish to participate in the hearing session(s), please outline why nsider this to be necessary:

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Name and Organisation:		n: R	ROBERT, C.TURNER					
1. To which	n docume	nt does	this repre	sentatio	on relate?			
Regulation	on 19: Pre-	Submissio	n Draft of th	ne Shrops	hire Local Pl	an		
Sustaina Local Pla		aisal of the	Regulation	19: Pre-9	Submission (Oraft of	the Shro	pshire
Shropsh	Regulation ire Local Pla tick one bo	an	ent of the R	egulation	19: Pre-Su	bmissior	Draft o	f the
22. To which	n part of	the docu	ment doe	s this re	presentat	ion rel	ate?	
Paragraph: A	ppendix	Policy:	S3.1	Site:	STC002/P5		Policies Map:	3
Q3. Do you o			lation 19:	Pre-Su	bmission	Draft o	f the	
A. Legally co				Yes:		No:		
B. Sound				Yes:		No:	$ \overline{\mathbf{V}} $	
C. Compliant with the Duty to Co-ope		-operate	Yes:		No:			
(Please tick	as appropr	iate).						
Q4. Please g Draft of the fails to comp If you wish to s of the Shropshi set out your con	Shropshiply with the language of the language	re Local the duty legal comple n or its con	Plan is no to co-ope liance or sou appliance with roposed alloc	rate. Ple ndness of the duty	y compliar ease be as the Regulation	nt or is precise on 19: Precise, please and in Bri	e as pore-Submiter also using disporting the contract of the c	nd or ossible. vission Dra e this box contained i
			it is very wor					
	new garden away from t would, if th	village as p the main ur e Review Pi	roposed for To ban area – ve lan is approve	asley. This ry possibly ed, be rem	e set up on a b suggests that Stanmore. T oved from Gr would be locd	t it might he sites p een Belt ated in co	be set up proposed protectio	in a locatio at Stanmoi n. Howeve

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

	No, I do not wish to participate in hearing session(s)
$ \mathbf{V} $	Yes, I wish to participate in hearing session(s)
	(Please tick one box)
you c	you wish to participate in the hearing session(s), please outline why onsider this to be necessary:
sites Revie and 6 of loc	to accept the proposals put forward in the various drafts of the Local Planew, and they have not been adequately represented by locally elected Paarish County Council official and Members. It is considered essential that the wishes cal people, who will be those most affected by the proposed development, ld be heard.
those	(Please continue on a separate sheet if necessary) a note: The Inspector will determine the most appropriate procedure to adopt to hear who have indicated that they wish to participate in hearing session(s). You may be asked firm your wish to participate when the Inspector has identified the matters and issues for nation.
Signat	ure: Date: 24/2/2/