

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:	Stanmore Consortium
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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:	<input type="text"/>	Policy:	S3.1 (i) Site Allocation Tasley Garden Village, Bridgnorth (BRD030)	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Click or tap here to enter text.

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.

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.

Stanmore Consortium object to the development strategy for Bridgnorth which is not justified or effective as the evidence base does not support the strategy to allocate Tasley Garden Village taking into account the reasonable alternative at Stanmore Garden Village. Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) remain relevant.

(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.

Tasley BRD030 should be deleted and Stanmore Garden Village (BRD032) (part) should be allocated for 70 ha comprising 850 dwellings, 16ha employment land, new local centre and green space.

(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)?

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:
	Part B Reference:

It is too complex to deal with in writing

(Please continue on a separate sheet if necessary)

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Signature: [

]

Date: 23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Name and Organisation:	Stanmore Consortium
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- 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:	Policy 3.1 Schedule S3.1 (ii) Employment Allocations: Bridgnorth Principal Centre. Land north of Stanmore Industrial Estate (P58a)	Site:		Policies Map:	
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input type="checkbox"/> |

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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 allocation of the employment sites at Stanmore are supported as they are necessary extensions to the Stanmore Business Park (formerly Industrial Estate).

The Policy has however been amended and as a result is unsound, to remove use class B1. This is presumably to reflect the changes to the Use Classes Order, effective from September 2020 when use class B1 was revoked. The policy should be amended to add the new business use class E(g)(i),(ii),(iii) that superseded B1 as these are essential uses to allow the site to reach its potential and provide flexibility in the Plan to ensure the best chance of delivery and allow for market changes.

The policy should also be amended to reference Stanmore Business Park, rather than Industrial Estate, as it has not been known as the Industrial Estate since 2017.

In respect of need and exceptional circumstances for the employment allocations, Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) provide evidence (Paragraphs 5.4.11 – 5.4.17). The case in respect of need is set out in Appendix S of those representations in report Employment Led Development of a Garden Village Community – prepared by Macmullen Associates March 2020 which demonstrates the success of Stanmore Business Park and the need for existing businesses to grow. An addendum to this report has been prepared by Macmullen Associates October 2020 to provide an updated position on occupation of the business park and alternative locations for employment in Bridgnorth (Appendix 2). It confirms the business park is running at capacity with sites refurbished as they become available before being re-let.

In respect of the new use class E(g) that supersedes B1, there are uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already, for example, there are a couple of firms who undertake ultra-precision measuring and calibrating, an office use. Such uses are complementary to the engineering and the advanced manufacturing businesses on site. The existing uses are therefore in class E (g), B2, B8 and Sui Generis uses such that whilst the new employment allocation at P58a and STC002 will be focused towards the engineering and advanced manufacturing sectors, there needs to be the opportunity to complement or allow the existing employment base in all use classes to grow and to respond to market changes.

Shropshire Economic Development Needs Assessment (EDNA) interim report December 2020 prepared by Lichfield's on behalf of Shropshire Council shows the employment sector is predicted to undergo structural changes over the plan period with growth and decline in job sectors in Shropshire that in all scenarios forecast a workforce change with growth in office and light industrial class E(g), a fall in B2 and a near neutral position in B8. This is however Shropshire wide. Therefore, to allow for market changes and give the employment land at Stanmore the best chance of delivering employment over the plan period, the use classes should be kept as broad as possible.

In addition, there may be some long-term shift in working patterns as a result of the Covid-19 pandemic that are not yet evident but may become established over the plan period and a flexible and responsive policy is the best option to ensure delivery.

(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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The first paragraph of the policy for each site should be amended with the addition as follows:

'Development will be within primary use classes B2, B8 and will include uses within class E (g) (i) (ii) and (iii), together with appropriate sui generis uses. It will be targeted towards the engineering and advanced manufacturing sectors to complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy.

(Please continue on a separate sheet if necessary)

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 Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Part A Reference:

Part B Reference:

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- 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:	Policy 3.1 Schedule (ii) Employment Allocations: Bridgnorth Principal Centre Land adjacent Hickman Road, Stanmore Industrial Estate (STC002)	Site:		Policies Map:	Click or tap here to enter text.
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The Policy has however been amended and as a result is unsound, to remove use class B1. This is presumably to reflect the changes to the Use Classes Order, effective from September 2020 when use class B1 was revoked. The policy should be amended to add the new business use class E(g)(i),(ii),(iii) that superseded B1 as these are essential uses to allow the site to reach its potential and provide flexibility in the Plan to ensure the best chance of delivery and allow for market changes.

The policy should also be amended to reference Stanmore Business Park, rather than Industrial Estate, as it has not been known as the Industrial Estate since 2017.

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Signature:

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Date: 23/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Name and Organisation:	Stanmore Consortium
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Q1. To which document does this representation relate?

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- 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:	Schedule S3.1 (iii) Land West of Tasley Garden Village, Bridgnorth	Site:		Policies Map:	Click or tap here to enter text.
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

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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.

Stanmore Consortium object to the development strategy for Bridgnorth including the land west of Tasley identified as the proposed Potential Future Direction of Growth, which is not justified or effective as the evidence base does not support the strategy to allocate Tasley Garden Village taking into account the reasonable alternative at Stanmore Garden Village. Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) remain relevant.

(Please continue on a separate sheet if necessary)

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Land West of Tasley Garden Village 41.5ha should be deleted and Land Safeguarded for Future Development at Stanmore Garden Village (BRD032) (part) 33 ha should be allocated.

(Please continue on a separate sheet if necessary)

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Yes, I wish to participate in hearing session(s)

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- 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:	<input type="text" value="Click or tap here to enter text."/>	Policy:	Chapter 10 Regulation 19 Pre-submission Draft Plan – Table 10.1	Site:	<input type="text"/>	Policies Map:	<input type="text" value="Click or tap here to enter text."/>
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See Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) as comments in respect of limitations of methodology on proximity to employment and assessment of heritage assets are still relevant and no changes have been made to the Appraisal.

In addition, Table 10.1 Assessment Matrix for the Regulation 19 SA of Sites Criteria 13 and 14 (heritage) do not match the site-specific assessments in the Annex D Bridgnorth and the criteria are different to the earlier Regulation 18 assessment. As there is no text to suggest the criteria assessment has been purposely amended, it is thought Table 10.1 has been altered in error. This needs amendment or clarification as to why it has changed.

If Table 10.1 criteria 13 and 14 have been changed purposefully and Annex D site specific assessment is incorrect, then Stanmore Consortium object.

As shown in Table 10.1 criteria 13 would mean a listed building within a site would not be recorded; criteria 14 would only record the top two grades of listed buildings, ie a grade II listed building would not be recorded; and the buffer has changed.

(Please continue on a separate sheet if necessary)

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Table 10.1 should be amended and site-specific assessments amended as a consequence.

To address SO6: Reduce the need of people to travel by car, Criteria No. 5 or 6 should be amended to add to 'site boundary within 480m of a protected employment site'

To address SO15: Conserve and enhance features and areas of heritage value and interest, Criteria No. 13 and 14 should be amended to reflect significance, not distance. Criteria 13 and 14 to be corrected with reference to listed buildings and grade II listed buildings.

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(Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	Policy 3.1 – Development Strategy: Bridgnorth Principal Centre	Site:	<input type="text"/>	Policies Map:	<input type="text"/> Click or tap here to enter text.
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The Strategy should set out the key issues for Bridgnorth and the constraints of the town that are significant in determining a strategy to direct growth and identify a deliverable development to meet the identified need.

The key issues are the need for more affordable housing; addressing the imbalance between housing and employment; and improving access to community facilities and open space.

The search for sites should be specified with the focus on the constraints of the settlement formed by the river and its floodplain; the landscape sensitivity to the north and south west; the physical barrier of the A458 southern by-pass; and the Green Belt to the east.

Stanmore Garden Village should be recognised as a deliverable allocation for a garden village to address the key issues and have regard to the constraints of the settlement.

(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)?

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)

Office Use Only	Part A Reference:
	Part B Reference:

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is too complex to deal with in writing.

(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: 23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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)**.

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	<input type="text" value="Policy SP2 part 3 – Strategic Approach"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

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.

Support

(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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Support

(Please continue on a separate sheet if necessary)

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- 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:

(Please continue on a separate sheet if necessary)

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Signatur

Date:

23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	<input type="text" value="Policy SP2 Part 5 - Strategic Approach"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

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.

Support

(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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Support

(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:

(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:

23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

Q1. To which document does this representation relate?

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- 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:	<input type="text"/>	Policy:	<input type="text" value="Policy SP2 part 3 – Strategic Approach"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

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.

Support

(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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Support

(Please continue on a separate sheet if necessary)

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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:
	Part B Reference:

(Please continue on a separate sheet if necessary)

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Signature: [

Date: 23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	<input type="text" value="Policy SP3 – Climate Change"/>	Site:	<input type="text"/>	Policies Map:	<input type="text" value="Click or tap here to enter text."/>
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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.

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.

Stanmore Consortium representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of the submitted representations document) remain relevant and the plan is unsound as it is not justified or effective. The policy should recognise the contribution of land use planning to support the transition to a zero-carbon economy.

(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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SP3.1. Reducing carbon emissions through a number of means including:
New criterion a. Sites for development should be located so as to reduce the distance travelled to jobs having regard to commuting patterns; and housing should be located close to jobs so as to reduce the need to travel.

(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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- 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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(Please continue on a separate sheet if necessary)

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Signature:

--

Date:

23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	<input type="text" value="Policy SP4 - Sustainable Development"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

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 Consortium support a positive approach to sustainable development and recognition of the presumption in favour of sustainable development in the NPPF.

(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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None

(Please continue on a separate sheet if necessary)

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 Yes, I wish to participate in hearing session(s)

(Please tick one box)

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(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature: [

Date: 23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	<input type="text" value="Policy SP5
- High Quality Design"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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 Consortium support the delivery of high-quality design in new development to ensure the creation of better places; promote individual and community well-being; and enhance the way places are enjoyed and experienced by those who live, work or visit.

Stanmore Garden Community has a focus on high quality design and as a legacy landowner the Apley Estate have the ability to deliver above the standard. One of the principles that underpins Garden Communities is:

“Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities and including opportunities to grow food.”

At Stanmore, the Apley Estate, as a legacy landowner can deliver through the use and the control of local and regional housebuilders, a vision with building design and features relating to locally distinctive development and bring innovative design that will positively contribute to the character, appearance and local identity of the area. It will be planned as a settlement with cohesive layout and design.

At Stanmore, the Consortium will create a real sense of place that will become the heart of the development. The Community Centre will be designed for traditional retail uses such as independent butchers, bakers and greengrocers selling local produce alongside a café and associated leisure and cultural facilities in buildings where building elevations respond to their surroundings and position within the settlement.

Stanmore is committed to the principles of Garden Village design and has recruited the renowned authority on such developments, Lord Matthew Taylor, as a principal adviser on the scheme. He is involved in the delivery of a number of Garden Communities in the UK created by Government’s Garden Communities programme.

The Consortium will adopt a strict Design Code which will be implemented to a high standard by local and regional housebuilders. It will deliver high quality housing to a phased masterplan.

The long-term involvement of the landowner brings the ability to powerfully enforce design quality, placemaking and planning throughout the life of the development.

Apley Estate is a respected Bridgnorth-based landowner. It has successfully managed the 8,500 acre estate over many decades. Apley will implement a Stewardship arrangement at Stanmore, for the benefit of the community.

The West Midlands Design Charter is fully supported and the Stanmore Consortium are fully committed to delivering high quality design.

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

None

(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)?

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:

(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:

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	Policy SP11 (previously DP25) – Green Belt and Saguarded Land 3.96 – 3.100	Site:		Policies Map:	Click or tap here to enter text.
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

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.

Policy SP11 was previously Policy DP25, the change from a development management policy to a strategic policy is supported.

Stanmore Consortium representations to the Regulation 18 Pre submission Draft Plan Policy DP25 (Appendix 1 of the submitted representations document) remain relevant and the plan is unsound. It is not justified as the evidence base is defective for the reasons set out.

The Green Belt Study methodology needs revising as set out and such revision could result in different outcomes as Stanmore Consortium consider Stanmore Garden Village does not cause the level of harm to Green Belt as the Study concludes. As a result, Stanmore Garden Village should be released from Green Belt, not just Stanmore employment allocation as proposed.

(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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Revised methodology of the Green Belt Study and the release of Stanmore Garden Village from the Green Belt. Consequential Modification to Table SP11.1 Green Belt Release by Location and Type to include Stanmore Garden Village which includes the Stanmore employment allocation as follows:

Table SP11.1: Green Belt Release by Location and Type						
Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)
Stanmore Garden Village (Bridgnorth)		70			33	103
Stanmore (Bridgnorth)			11.4			11.4

(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)?

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)

Office Use Only	Part A Reference:
	Part B Reference:

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is too complex to deal with in writing.

(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:

23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	Policy SP12 – Economic Growth (previously SP10)	Site:	<input type="text"/>	Policies Map:	Click or tap here to enter text.
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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.

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 and objectives of Policy SP12 are appropriate and are supported. Bridgnorth, a Principal Centre, is well placed geographically to attract inward investment and meet economic needs. It has a high level of sustainability with a vast range of services and facilities that makes it a suitable location for growth.

(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.

N/A

(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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(Please continue on a separate sheet if necessary)

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Signature:

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Date:

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Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
------------------------	---------------------

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:	<input type="text"/>	Policy:	Policy SP13 – Delivering Sustainable Growth and Enterprise (previously SP11)	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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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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Policy SP13 was previously Policy SP11 in the Regulation Pre-Submission Draft Plan and now appears in a slightly amended form as Policy SP13. Stanmore Consortium representations to Policy SP11 of the Regulation 18 Plan (Appendix 1 of the submitted representations document) remain relevant.

The inclusion of updated employment use classes to reflect the change in the Use Classes Order 1987 (as amended) is supported and needs to be followed through to policy site allocations.

However, as a result of amendments, the employment policies in SP12, SP13 and SP14 together, have become overcomplicated and repetitive with the likely effect to deter employment development as there are so many strands of policy to navigate through for a development to be supported. The policies together need clarity on what they actually relate to, for example, they conflate a strategy to select sites to allocate, guiding development on allocated sites and consideration of sites not allocated. A simplified approach would be welcomed that will allow employment growth to flourish.

The Council's approach makes the plan unsound as the policies are not effective and delivery of employment sites may be unintentionally hindered as a result

(Please continue on a separate sheet if necessary)

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The Strategy should set out the key issues for Bridgnorth in relation to delivering sustainable economic growth, Policy SP13 needs to be simplified which will allow encourage and direct development direct to meet the identified need.

There should be recognition within the policy that development falling within new Use Class E(g) are suitable in particular uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already.

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	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:

(Please continue on a separate sheet if necessary)

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Representation Form

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Part B: Representation

Name and Organisation:	Stanmore Consortium
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Q1. To which document does this representation relate?

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- 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:	<input type="text"/>	Policy:	Policy SP14 – Strategic Corridors (Previously DP9)	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(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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Stanmore Consortium support Bridgnorth being within the eastern belt strategic corridor as a recognised location to attract inward investment and support growth.

By way of comment, the policy is however considered to be over complicated and should focus on the allocated sites.

(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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N/A

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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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Office Use Only	Part A Reference:
	Part B Reference: