

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

SPENCER		
epresentation r	elate?	
of the Shropshire L	ocal Plan	
ition 19: Pre-Submi	ssion Draft of the Shr	opshire
he Regulation 19: F	Pre-Submission Draft o	of the
does this repre	sentation relate?	
Site: STC0	02/P58a Policies Map:	3
19: Pre-Submi	ssion Draft of the	
Yes:	No:	
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e Yes:	No:	
	of the Shropshire L ation 19: Pre-Submit the Regulation 19: P does this repres Site: STCO 19: Pre-Submit Yes: Yes:	Site: Site: Site: Map: n 19: Pre-Submission Draft of the Yes: No: Image: Yes: No: Image:

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 proposed employment allocations at Stanmore are presented in the Local Plan Review as being necessary to serve the needs of Bridgnorth, and the Stanmore area is presented as being part of Bridgnorth town. This is not the case. The Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment. It is located in open countryside and does not form a natural extension to Bridgnorth.

The Local Plan Review Policy S3.1 indicates that the Bridgnorth area will deliver 1,800 houses and 49 ha of employment land in Bridgnorth. The Strategic Land Supply 2016 – 2038 set out in Appendix 6: Employment Development Guidelines and Employment Land Supply, however, indicates that a total of 40.5 ha of land is to be allocated in the Place Plan Area, with only 37.7 ha to be provided in Bridgnorth. Clearly there is a discrepancy in the figures. The Local Plan does not explain why it is necessary to allocate 49 ha of employment land in Bridgnorth. The discrepancy appears to be around the amount of develop-

ment proposed for employment uses at Stanmore. It does not appear that the figures support this allocation.

Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

(Please continue on a separate sheet if necessary)

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

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Sites STC002 and P58a – allocated for employment development at Stanmore – should be deleted from the Plan. There is no requirement for an alternative site to be identified.

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Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

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No, I do not wish to participate in hearing session(s)



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

(Please tick one box)

Office Lies 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.

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Signature:

Date: 22/02/2021

Office Use Only	Part A Reference:	
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Part B:Representation

Na	me and Organisation: JUDY C	SPENCER	
Q1.	To which document does this repr	esentation rela	te?
2	Regulation 19: Pre-Submission Draft of t	he Shropshire Loca	l Plan
	Sustainability Appraisal of the Regulation Local Plan	19: Pre-Submissio	on Draft of the Shropshire
	Habitats Regulations Assessment of the F Shropshire Local Plan (Please tick one box)	Regulation 19: Pre-	Submission Draft of the
Q2.	To which part of the document do	es this represer	ntation relate?
araç	graph: Policy: SP1	Site: STC002	/P58a Policies 3 Map: 3
and the second second	Do you consider the Regulation 19 ropshire Local Plan is:	9: Pre-Submissi	on Draft of the
Α.	Legally compliant	Yes:	No:
в.	Sound	Yes:	No:
c.	Compliant with the Duty to Co-operate lease tick as appropriate).	Yes:	No:

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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

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

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

Date: 22/02/2021

Part A Reference:	
Part B Reference:	



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Part B:Representation

Name and Organisation:	JUDY	SPENCE	R		
Q1. To which document	does this r	representat	ion relat	te?	
Regulation 19: Pre-Sub	mission Draft	of the Shrops	shire Local	l Plan	
Sustainability Appraisal Local Plan	l of the Regula	ation 19: Pre-	Submissio	n Draft of t	he Shropshi
Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of t	the Regulatior	19: Pre-9	Submission	Draft of the
Q2. To which part of the	e document	t does this i	epresen	tation re	late?
Paragraph: Po	olicy: SP10	Site:	STC002/	P58a P	Policies 3 Map: 3
Q3. Do you consider the Shropshire Local Plan is		n 19: Pre-S	ubmissio	on Draft o	of the
A. Legally compliant		Yes:		No:	
B. Sound		Yes:		No:	
C. Compliant with the Duty (Please tick as appropriate)		e Yes:		No:	

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The sites proposed for employment development at Stanmore is situated in open countryside, and are accessed through a country park. The Council, and the local residents in the Stanmore area, have gone to great lengths in the past to preserve this situation.

Policy SP10 of the Local Plan Review proposes to restrict economic development in rural areas in line with national guidance. Policy SP10 says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. There is no guarantee that the proposed allocations will produce that effect, so the proposed allocations are an attempt to side-step such limitations for future developers. There is no reason why such allocations should be made, the countryside should continue to be protected.

The reasons why this area of countryside should not be protected as the majority of the

		of the Councy are, have not been justified and the need for the pro- not been properly evidenced.
		(Please continue on a separate sheet if necessary ification(s) you consider necessary to make the
compliant		sion Draft of the Shropshire Local Plan legally spect of any legal compliance or soundness matters bove.
examination Submission	. You will need to say w Draft of the Shropshire	ith the duty to co-operate is incapable of modification at why each modification will make the Regulation 19: Pre- Local Plan legally compliant or sound. It will be helpful if you are revised wording of any policy or text. Please be as precise as
		ed for employment development at Stanmore – should be no requirement for an alternative site to be identified.

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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)

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

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Na	me and Organisation:	JUDY	SPENCER	2 .		
Q1.	To which docume	nt does this re	presentation	relate?		
7	Regulation 19: Pre-S	ubmission Draft o	f the Shropshire	Local Plan		
	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan					
	Habitats Regulations Shropshire Local Plan (Please tick one box	1	e Regulation 19:	Pre-Submissio	on Draft of the	
Q2.	To which part of t	he document d	loes this repr	esentation r	elate?	
Parag	graph:	Policy: SP11	Site: STC	002/P58a	Policies Map: 3	
	Do you consider t opshire Local Plan		19: Pre-Subm	ission Draft	of the	
Α.	Legally compliant		Yes:	No:		
в.	Sound		Yes:	No:		
	Compliant with the Du	ty to Co-operate	Yes:	No:	П	

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> The sites proposed for employment development at Stanmore are located in the Green Belt and Policy SP11 sets out to protect the Green Belt. The proposed allocation would remove the land from Green Belt protection without any exceptional circumstance being demonstrated. There is no indication of which businesses might wish to locate at Stanmore, and so the proposal appears to be a device to ensure that future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, that is, that proposals have to demonstrate that 'very special circumstances' exist.

Policy SP11 says that the Green Belt will be protected in accordance with national policy. National policy is to protect green belts from 'inappropriate development'. Inappropriate development can be anything that detracts from the fundamental functions of green belts, which are to preserve their openness and to ensure their permanence. The National PlanQ7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Part A Reference: Office Use Only Part B Reference:

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)

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

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	Sustainability Apprais Local Plan	al of the Regulation	n 19: Pre-S	Submission	Draft of	the Shro	opshire
	Habitats Regulations A Shropshire Local Plan (Please tick one box)		Regulation	19: Pre-Su	bmissio	n Draft o	of the
Q2.	To which part of th	ne document do	es this r	epresenta	ation r	elate?	
arag	graph: Appendix 6	Policy: S3.1	Site:	STC002/P	58a	Policies Map:	3
	Do you consider th opshire Local Plan		9: Pre-Su	bmission	Draft	of the	
Α.	Legally compliant		Yes:		No:		
в.	Sound		Yes:		No:		
	Compliant with the Dut ease tick as appropriate		Yes:		No:		

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> The note against the proposed allocation of employment land in Bridgnorth contained in Appendix 6 indicates that there is a Preferred Site for Recycling and Environmental Industries. This is not detailed, but it is very worrying.

> It seems unlikely that a recycling plant would be set up on a brand-new industrial estate in a new garden village as proposed for Tasley. This suggests that it might be set up in a location away from the main urban area – very possibly Stanmore. The sites proposed at Stanmore would, if the Review Plan is approved, be removed from Green Belt protection. However, they would still be <u>surrounded</u> by Green Belt and would be located in countryside where there is no need for such development. It is considered that such a location would, in any event, be an inappropriate location for recycling activities. There is already such an operation not far from Stanmore, towards Worfield, and within the Green Belt, which is the source of environmental problems, and an intensification of that use would not be an ac

ceptable situation.

The calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates that an "additional provision to address local circumstances" of 12 ha is needed. The precise reasons for needing this additional provision, and exactly how the figure of 12 ha has been arrived at is not given.

There is no "local circumstance" that would justify such a provision. This is evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate. If the local circumstance is so acute, these areas would have been developed/redeveloped, by now. The fact that, in the over 40 years that the Stanmore Business Park has been in operation, the existing land and buildings have never been fully developed and put to operational use, indicates that an additional 11.5 ha as the Plan proposes is not justified or evidenced, and there is no certainty that it can be delivered.

The only certainty is that it will adversely affect the green belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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No, I do not wish to participate in hearing session(s)

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

(Please tick one box)

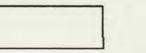
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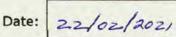
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