

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: Represer	ntation					
N	ame and Organisation:	Philip Luckett					
Q1.	To which document	does this represe	entatio	on relate?			
$\overline{\checkmark}$	Regulation 19: Pre-Sul	omission Draft of the	Shrops	hire Local Pla	n		
	Sustainability Appraisa Local Plan	l of the Regulation 19	9: Pre-S	Submission Di	aft of	the Shro	pshire
	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 re	presentation	on rel	ate?	
Para	graph: Appendix 6	Policy: S3.1	Site:	STC002/P58		Policies Map:	3
_	Do you consider the	_	re-Sul	bmission D	raft o	f the	
	opshire Local Plan is	:	Vasi		N.		
Α.	Legally compliant		Yes:		No:		
В.	Sound		Yes:		No:	$\overline{\checkmark}$	
	Compliant with the Duty	•	Yes:		No:		
Draf fails <i>If you</i>	Please give details of the Shropshire to comply with the wish to support the lega	Local Plan is not duty to co-opera compliance or sound	legally te. Ple ness of t	compliant ase be as p the Regulation	or is precis	unsour e as po e-Submis	nd or ssible. ssion Draft
	e Shropshire Local Plan or ut your comments.	its compliance with th	ne duty i	to co-operate,	please	also use	this box to
	Appendix 6 indic	st the proposed allocati ates that there is a Prefe led, but it is very worryii	erred Site			•	
	new garden villo away from the I would, if the Re they would still l is no need for so be an inappropi	or that a recycling plant varies as proposed for Task main urban area — very eview Plan is approved, pe <u>surrounded</u> by Green uch development. It is contained in the contained	ey. This possibly be remo Belt and considere	suggests that it Stanmore. The oved from Gree would be locate ed that such a l ties. There is a	might less parages sites parages parage parages parages parage parages parages parage parages parages	be set up i roposed a protectior intryside v would, in uch an op	n a location It Stanmore I. However, where there any event, eration not

ronmental problems, and an intensification of that use would not be an acceptable situation.

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

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

(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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errand year eaggerea removal meranig er amy peneg er cente react de president
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)

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

	No, I do not wish to participate in hearing session(s)				
\checkmark	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 onsider this to be necessary:				
sites Revie and C of loc	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 Parish 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)				
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Signatı	re: Date: 26/02/2021				



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Par	t B: Represe	ntation					
Na	me and Organisation:	Philip Luckett					
Q1. T	o which documen	t does this repre	esentatio	on relate	?		
$\overline{\checkmark}$							
	Sustainability Apprais Local Plan	sal of the Regulatior	19: Pre-9	Submissio	n Draft of	the Shro	pshire
	Habitats Regulations Shropshire Local Plan (Please tick one box)		Regulation	19: Pre-S	Submissior	Draft o	f the
Q2. T	o which part of th	e document doe	s this re	present	ation rel	ate?	
Parag	raph:	Policy: S3.1	Site:	STC002/		Policies Map:	3
	Oo you consider th		: Pre-Su	bmissio	n Draft o	f the	
	- Legally compliant		Yes:		No:		
В. 9	Sound		Yes:		No:	\checkmark	
	Compliant with the Du		Yes:		No:		
Draft fails If you of the	Please give details to the Shropshire to comply with the wish to support the leg Shropshire Local Plan of your comments.	e Local Plan is no e duty to co-ope al compliance or sou	ot legally rate. Ple Indness of	compliance compliance compliance complex the complex t	ant or is as precis ation 19: Pr	unsoui e as po e-Submi	nd or ossible. ission Draft
	The proposed as being neces being part of a rated from Bri does not form The Local Plan and 49 ha of e in Appendix 6:	employment allocations ary to serve the need Bridgnorth town. This dgnorth by a steep wo a natural extension to Review Policy S3.1 independent of the Employment Development of the total of 40.5 ha of larovided in Bridgnorth.	ls of Bridgna is not the cooded escarp Bridgnortha icates that a dgnorth. The nent Guideland is to be	orth, and the case. The Soment. It is the Bridgno ne Strategic ines and En	ne Stanmore Stanmore and Scated in a The area will Land Supply Inployment L In the Place	e area is p ea is phys open cour deliver 1 y 2016 – 2 and Suppl Plan Are	nresented as sically sepa- ntryside and ,800 houses 2038 set out ly, however, a, with only

Plan does not explain why it is necessary to allocate 49 ha of employment land in Bridgnorth.

		ant of development proposed for employment igures support this allocation.
		d, and has not been prepared on the basis of ements and take-ups of employment or em-
	(Please co	ntinue on a separate sheet if necessary)
Q5. Please set out the modific Regulation 19: Pre-Submission compliant and sound, in responded to the property of the property	cation(s) you con on Draft of the Sh ect of any legal c	sider necessary to make the
Please note that non-compliance with examination. You will need to say wh Draft of the Shropshire Local Plan leg forward your suggested revised word	the duty to co-operat y each modification wi ally compliant or sound ing of any policy or tex	ll make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put ct. Please be as precise as possible.
		elopment at Stanmore – should be alternative site to be identified.
Please note: In your representation	•	ntinue on a separate sheet if necessary) succinctly all the evidence and
supporting information necessary to modification(s). You should not assubmissions.	support your repres	entation and your suggested
After this stage, further submissions based on the matters and issues		
•	pshire Local Plan	cation to the Regulation 19: Pre- do you consider it necessary to
Please note that while this will prov session(s), you may be asked at a		n of your wish to participate in hearing your request to participate.
No, I do not wish to particip	oate in hearing sessio	n(s)
Yes, I wish to participate in (Please tick one box)	hearing session(s)	
Q7. If you wish to participate	e in the hearing se	ession(s), please outline why
you consider this to be neces	ssary:	
	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 Parish 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:	26/02/2021				



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Pa	rt B: Represen	ntation				
N	lame and Organisation:	Philip Luckett				
Q1.	To which document	does this representation relate?				
\checkmark	Regulation 19: Pre-Sub	bmission Draft of the Shropshire Local 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)	ssessment of the Regulation 19: Pre-Submission Draft of the				
Q2.	To which part of the	e document does this representation relate?				
Para	graph: Po	olicy: SP1 Site: STC002/P58a Policies Map: 3				
	Do you consider the opshire Local Plan is	Regulation 19: Pre-Submission Draft of the				
	Legally compliant	Yes: No: N				
В.	Sound	Yes: ☐ No: ✓				
	Compliant with the Duty Please tick as appropriate	— — — —				
Drai fails If you of the	ft of the Shropshire I s to comply with the u wish to support the legal	of why you consider the Regulation 19: Pre-Submission Local Plan is not legally compliant or is unsound or duty to co-operate. Please be as precise as possible. I compliance or soundness of the Regulation 19: Pre-Submission Draft its compliance with the duty to co-operate, please also use this box to				
	the Plan Review Stanmore, beca "making settlen is very small and to become more The Policy is not	use such development would not "contribute to meeting local needs" or to nents more sustainable" as Policy SP1 requires. The settlement at Stanmore d does not require 11.5ha. of employment development to meet its needs or				

(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.
(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:
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

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Review, and they have not been adequately represented by locally elected Parish 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.

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

Signature:	Date:	26/02/2021
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Office Use Only

Part A Reference:

Part B Reference:



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Par	t B: Represer	itation					
Na	me and Organisation:	Philip Luckett					
Q1. 1	To which document	does this repre	sentatio	n relate	?		
\checkmark	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)					of the	
Q2. 1	To which part of the	document doe	s this re	present	ation rel	ate?	
Parag	raph: P	olicy: SP10	Site:	STC002/		Policies Map:	3
_	Oo you consider the pshire Local Plan is		: Pre-Sul	bmissio	n Draft o	f the	
Α. Ι	Legally compliant		Yes:		No:		
В. 9	Sound		Yes:		No:	$\overline{\checkmark}$	
	Compliant with the Duty	•	Yes:		No:		
Draft fails If you of the	Please give details of the Shropshire to comply with the wish to support the lega Shropshire Local Plan or t your comments.	Local Plan is no duty to co-ope I compliance or sou	ot legally rate. Ple ndness of a	compliance compliance be a the Regula	ant or is as precis ation 19: Pi	unsou e as po e-Subm	nd or ossible. ission Draft
	side, and are ac Stanmore area, Policy SP10 of the eas in line with the ca tryside will be a There is no guar allocations are	sed for employment occessed through a conhave gone to great less at local Plan Review national guidance. Pollowed where they mantee that the proposion attempt to side-side allocations should	untry park. engths in the proposes to plicy SP10 so naintain or sed allocation tep such lin	The Coune past to porestrict educations that decented in the country is a second to the country in the country is a second to the country in the country is a second to the country is	cil, and the reserve this conomic development pountryside voluce that eperfuture dev	local resi situation relopmen roposals itality an ffect, so t velopers.	t in rural ar- in the coun- d character. he proposed There is no

	rside should not be protected as the majority of the rest have not been justified and the need for the proposed denced.
and and an area area area area area area area a	
	[Please continue on a separate sheet if necessary]
Q5. Please set out the modification(s) Regulation 19: Pre-Submission Draft o	you consider necessary to make the
Please note that non-compliance with the duty to examination. You will need to say why each modification of the Shropshire Local Plan legally compliant forward your suggested revised wording of any posterior of the Shropshire Local Plan legally compliant forward your suggested revised wording of any posterior of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording of the Shropshire Local Plan legally compliant forward your suggested revised wording the Shropshire Local Plan legally complex to the Shropshire Local Plan le	fication will make the Regulation 19: Pre-Submission at or sound. It will be helpful if you are able to put olicy or text. Please be as precise as possible.
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Please note: In your representation you should	Please continue on a separate sheet if necessary)
supporting information necessary to support you modification(s). You should not assume that you	ur representation and your suggested
submissions.	
After this stage, further submissions may based on the matters and issues he or she	
Submission Draft of the Shropshire Loc	modification to the Regulation 19: Pre- cal Plan, do you consider it necessary to
participate in examination hearing ses	sion(s)? I indication of your wish to participate in hearing
session(s), you may be asked at a later point to	
No, I do not wish to participate in hear	ng session(s)
Yes, I wish to participate in hearing ses	sion(s)
(Please tick one box)	
Q7. If you wish to participate in the he you consider this to be necessary:	aring session(s), please outline why
	Part A Reference:

Office Use Only

Part B Reference:

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Signature:		Date:	26/02/2021



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Na	ame and Organisation	: Philip Luckett					
Q1. 7	To which documer	nt does this repr	esentatio	on relate?			
\checkmark	Regulation 19: Pre-S	Submission Draft of	the Shrops	shire Local Pla	n		
	Sustainability Apprai Local Plan	sal of the Regulation	n 19: Pre-S	Submission Dr	aft of	the Shro	pshire
	Habitats Regulations Shropshire Local Plan (Please tick one box	n	Regulation	19: Pre-Subr	nissio	n Draft o	f the
Q2. 7	To which part of t	he document do	es this re	presentatio	on re	late?	
Parag	graph:	Policy: SP11	Site:	STC002/P58a		Policies Map:	3
	Do you consider the pshire Local Plan		: Pre-Su	bmission D	raft o	f the	
	Legally compliant		Yes:		No:		
В.	Sound		Yes:		No:	$\overline{\checkmark}$	
	Compliant with the Dules	•	Yes:		No:		
Draf	Please give details t of the Shropshire to comply with th	e Local Plan is n	ot legally	/ compliant	or is	unsoui	nd or
If you of the	wish to support the le Shropshire Local Plan It your comments.	gal compliance or sou	undness of	the Regulation	19: P	re-Submi	ssion Draft
	and Policy SP the land fron strated. The so the propo Stanmore are	posed for employment 11 sets out to protect or Green Belt protection or is no indication of v or all appears to be a d or not subject to the lime onstrate that 'very spec	the Green B n without a which busine evice to en litations imp	elt. The proposiny exceptional exses might wish sure that future posed by Policy.	ed allo circum to loc devel	ocation wo stance be ate at Sta lopment p	ould remove ing demon- nmore, and proposals at
	National polic	ays that the Green Be by is to protect green be on be anything that de	elts from 'ind	appropriate devi	elopme	nt'. 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)

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, ,, ,	•	,
No, I do not wish to partic	ipate in hearing	session(s)
 Yes, I wish to participate i	n hearing sessio	n(s)
(Please tick one box)		

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Office use offiy	Part B Reference:

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examination.		
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examination.	
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Susta Local	ainability Apprais I Plan	al of the	Regulation 1	9: Pre-Su	ıbmission Dra	aft of t	he Shro	pshire
☐ Shro	tats Regulations A pshire Local Plan ase tick one box)	Assessm	ent of the Re	gulation :	19: Pre-Subm	ission	Draft of	f the
Q2. To wh	nich part of th	e docu	ment does	this rep	resentatio	n rela	ate?	
Paragraph:	3	Policy:	SP2	Site:	Click or tap here to enter text.	Po	olicies Map:	
	ou consider the re Local Plan is		lation 19: I	Pre-Sub	mission Dr	aft of	f the	
A. Legall	y compliant			Yes:		No:		
B. Sound	I			Yes:		No:	\checkmark	
•	liant with the Dut	•	operate	Yes:		No:		
Draft of the fails to co	e give details he Shropshire omply with the	Local duty t	Plan is not to co-opera	legally ite. Plea	compliant on se be as p	or is reciso	unsoui e as po	nd or ssible.
of the Shrop set out your		r its com	pliance with t	he duty to	co-operate, p	olease	also use	this box to
fraction of t	shortage of affor the proposed numb tms are been driven	er of unit	s at Tasley. The	e majority	of residents are			
Whilst some be of a volu both curren historic mar good quality	course land already e new housing, prim me compatible with t and future. These ket town that is Bri y farmland is frankly nexed in the future	narily affo n, and ser proposal dgnorth. y outrage	ordable, in the lastive to, the residues is seriously risk. The fact that it	Bridgnorth needs of th causing signs is propose	area is welcon e town and all gnificant dama ed to be achiev	ned, it i of its ir ge to th ed by b	needs to habitant ne attract ouilding o	s, iive n

There is no evidence that employers would see Bridgnorth as an ideal location for significant expansion of the type upon which the plans are predicated. One gathers that major local business have no desire for expansion otherwise than by way of existing plans. It seems unlikely proposed households could provide enough employees of the type required to service the assumed employment types (e.g. tech and IT jobs) with the result that employees would have to commute in from outside the area: why would such employers seek to base themselves in such a location with poor transport links?

There is negligible public transport that would be of benefit for this site.

The misleading description "Garden Village" masks the fact that the development would in reality likely become a vast housing estate, smaller than but similar to Perton in Wolverhampton, attracting incomers from the West Midlands. This would have a catastrophic impact on already over-stretched public services (e.g. Doctors etc). The proposals do not adequately address the real need in Bridgnorth which is primarily in the area of affordable housing.

Not enough consideration have been given to the impact of any significant development at Tasley might have on the road infrastructure and in particular the A442 (which is and continues to be in a terrible state) if, as seems likely, the "garden village" ends up being housing for commuters to Wolverhampton and the wider West Midlands. In addition there is the serious matter of vehicle pollution which is particularly bad in the area of Hospital Street. It is simply not sufficient to say that these matters will be looked at at the planning application stage. It is not at all clear how these matters could be addressed given that any enlargement of the A442 in Hospital Street would be not be possible. It therefore seems that the plans are predicated on the assumption that there will be a solution to these issues whereas the reality is that no solution will be possible.

(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.

The proposals are disproportionate having regard to the needs of the town and should be significanty scaled back.

Any development proposals should be conditional upon (1) significant improvements to local infrastructure and services and (2) reductions in air pollution which are already at unacceptably high levels along Hospital Street (A442)

(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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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.

OS TE			
Submi	your representation is seeking a modificati ssion Draft of the Shropshire Local Plan, do pate in examination hearing session(s)?		
	note that while this will provide an initial indication of (s), you may be asked at a later point to confirm you		
	No, I do not wish to participate in hearing session(s) $% \left(x\right) =\left(x\right) \left(x\right) $)	
\checkmark	Yes, I wish to participate in hearing session(s)		
	(Please tick one box)		
	you wish to participate in the hearing sessi onsider this to be necessary:	ion(s), please outline why	
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