

### 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.

Pai	rt B: Represen	ntation				
Na	Name and Organisation: Owen Fisher					
Q1.	To which document	does this representation relate?				
$\overline{\checkmark}$	Regulation 19: Pre-Sub	omission Draft of the Shropshire Local Plan				
	Sustainability Appraisal Local Plan	l of the Regulation 19: Pre-Submission Draft of the Shropshire				
	Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pre-Submission Draft of the				
Q2. <sup>-</sup>	To which part of the	document does this representation relate?				
Parag	graph: Appendix 6	Policy: S3.1 Site: STC002/P58a Policies Map: 3				
•		Regulation 19: Pre-Submission Draft of the				
	pshire Local Plan is:					
Α.	Legally compliant	Yes: No: No:				
В.	Sound	Yes: No: 🗸				
	C. Compliant with the Duty to Co-operate Yes: No: (Please tick as appropriate).					
Draf fails If you of the	t of the Shropshire I to comply with the 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. If compliance or soundness of the Regulation 19: Pre-Submission Draw its compliance with the duty to co-operate, please also use this box is				
	The note agains Appendix 6 indice This is not details It seems unlikely new garden villa away from the n would, if the Re they would still b is no need for su	Is the proposed allocation of employment land in Bridgnorth contained in a test that there is a Preferred Site for Recycling and Environmental Industries and but it is very worrying.  If that a recycling plant would be set up on a brand-new industrial estate in a age as proposed for Tasley. This suggests that it might be set up in a location main urban area — very possibly Stanmore. The sites proposed at Stanmore wiew Plan is approved, be removed from Green Belt protection. However, the surrounded by Green Belt and would be located in countryside where there is already by Green Belt and would be located in country in any event and the such a location for recycling activities. There is already such an operation not one, towards Worfield, and within the Green Belt, which is the source of environment.				

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.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

(Please continue on a separate sheet if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

	No, I do not wish to participate in hearing session(s)					
$\overline{\checkmark}$	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:	on(s), please	e outline why			
There has been considerable pressure placed on nearby residents to the proposed sites to accept the proposals put forward in the various drafts of the Local Plan Review, and they have not been adequately represented by locally elected Paarish and County Council official and Members. It is considered essential that the wishes of local people, who will be those most affected by the proposed development, should be heard.						
	(Please continu	e on a separate	sheet if necessary)			
<b>Please note:</b> 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.						
Signatu	ure: Owen Fisher	Date:	23/02/2021			

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Part A Reference:

Part B Reference:



### Representation Form

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We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B:	Part B: Representation							
Name and	Organisation:	Owen Fisher						
Q1. To which	ch document	does	this repre	sentatio	n relat	e?		
Regula	tion 19: Pre-Sub	missio	on Draft of t	he Shrops	hire Loca	ıl Plan		
Sustair Local P	nability Appraisa Ian	l of the	e Regulation	19: Pre-S	Submissio	on Draft of	the Shro	pshire
☐ Shrops	s Regulations A hire Local Plan e tick one box)	ssessn	nent of the F	Regulation	19: Pre-	Submissio	n Draft d	f the
Q2. To which	ch part of the	docu	ıment doe	s this re	presen	tation re	late?	
Paragraph:	Po	olicy:	S3.1	Site:	STC002,		Policies Map:	3
_	consider the Local Plan is	_	ılation 19	: Pre-Sul	bmissio	n Draft o	f the	
A. Legally	compliant			Yes:		No:		
B. Sound				Yes:		No:	$\overline{\checkmark}$	
·	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.								
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.

'	ancy appears to be around the am amore. It does not appear that the	ount of development proposed for employment efigures 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.					
	•	continue on a separate sheet if necessary)			
<b>Regulation 19: Pre-S</b>	ubmission Draft of the S , in respect of any legal	onsider necessary to make the Shropshire Local Plan legally compliance or soundness matters			
Please note that non-comp examination. You will need Draft of the Shropshire Loc	liance with the duty to co-oper to say why each modification wat al Plan legally compliant or sou	ate is incapable of modification at will make the Regulation 19: Pre-Submission und. It will be helpful if you are able to put			
Sites STC002 and P58a	- allocated for employment de	evelopment at Stanmore – should be			
deleted from the Plan.	There is no requirement for a	an alternative site to be identified.			
	(Please	continue on a separate sheet if necessary)			
supporting information ne	ecessary to support your repre	de succinctly all the evidence and esentation and your suggested nave a further opportunity to make			
submissions.	•	,. ,			
	r submissions may only be and issues he or she identii	made if invited by the Inspector, fies for examination.			
<b>Submission Draft of</b>		fication to the Regulation 19: Pre- n, do you consider it necessary to			
Please note that while thi	s will provide an initial indicat	ion 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)				
	ticipate in hearing session(s)	( )			
(Please tick one b	ox)				
Q7. If you wish to pa	-	session(s), please outline why			
,		Part A Reference:			
	Office Use Only	Part B Reference:			
	I	I I II I D NEICI CIICE.			

There has been considerable pressure placed on nearby residents to the proposed sites to accept the proposals put forward in the various drafts of the Local Plan Review, and they have not been adequately represented by locally elected Paarish and County Council official and Members. It is considered essential that the wishes of local people, who will be those most affected by the proposed development, should be heard.

(Please continue on a separate sheet if necessary)

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

examination	1.		
Signature:	Owen Fisher	Date:	23/02/2021

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



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Part B: Representation					
Name and Organisation:	Owen Fisher				
Q1. To which document	does this representation relate?				
Regulation 19: Pre-Sul	omission Draft of the Shropshire Local Plan				
Sustainability Appraisa Local Plan	l of the Regulation 19: Pre-Submission Draft of the Shropshire				
Habitats Regulations A Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pre-Submission Draft of the				
. ,	document does this representation relate?				
	olicy: SP1 Site: STC002/P58a Policies Map: 3				
Q3. Do you consider the Shropshire Local Plan is	Regulation 19: Pre-Submission Draft of the				
A. Legally compliant	Yes: No:				
B. Sound	Yes: No: 🗸				
C. Compliant with the Duty (Please tick as appropriate	<u> </u>				
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.	s policy are not supported by or conflict with the sime of other policies in				
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.					

(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

		, gally compliant or sound. I ling of any policy or text.			
Sites STC0 deleted fro	002 and P58a – allocate om the Plan. There is	d for employment develong requirement for an al	pment at Stanm ternative site to nue on a separat	ore - should be be identified.	
supporting modification submissions	information necessary t n(s). You should not as s.	o support your represent sume that you will have	tation and your s a further opportu	uggested ınity to make	
		sions may only be ma s he or she identifies t			
Submission participat	on Draft of the Shro e in examination h		o you conside	r it necessary to	
		vide an initial indication o later point to confirm yo			
No,	I do not wish to partici	pate in hearing session(s	5)		
<b>√</b> Yes	Yes, I wish to participate in hearing session(s)				
•	ase tick one box)				
	u wish to participate der this to be neces	e in the hearing sess ssary:	sion(s), please	e outline why	
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 officials 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.					
those who h	have indicated that they our wish to participate	(Please continetermine the most approperation of the most approperation of the most approperation has when the Inspector has	oriate procedure earing session(s)	. You may be asked	
Signature:	Owen Fisher		Date:	23/02/2021	
			Part A Reference	ce:	

Office Use Only

Part B Reference:



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Sustainability Appraisa Local Plan	al of the Regulation 19: Pre-Submission Draft of the Shropshire			
Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the			
Q2. To which part of the	e document does this representation relate?			
Paragraph:	olicy: SP10 Site: STC002/P58a Policies Map: 3			
Q3. Do you consider the Shropshire Local Plan is	Regulation 19: Pre-Submission Draft of the			
A. Legally compliant	Yes: No:			
B. Sound	Yes: No: 🗸			
C. Compliant with the Duty				
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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side, and are ac	sed for employment development at Stanmore is situated in open country-ccessed through a country park. The Council, and the local residents in the 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.				

,	e Councy are, have not l	d not be protected as the majority of the rest been justified and the need for the proposed		
<b>Regulation 19: Pre-Submissi</b>	ication(s) you con on Draft of the Sh pect of any legal c	ontinue on a separate sheet if necessary) nsider necessary to make the nropshire Local Plan legally ompliance or soundness matters		
Please note that non-compliance with examination. You will need to say wh	h the duty to co-operat ny each modification wi gally compliant or soun	ill make the Regulation 19: Pre-Submission d. It will be helpful if you are able to put		
	(Please co	ontinue on a separate sheet if necessary)		
<b>Please note:</b> In your representation supporting information necessary to modification(s). You should not as submissions.	on you should provide to support your repres	e succinctly all the evidence and sentation and your suggested		
After this stage, further submis based on the matters and issue	2 2	made if invited by the Inspector, es for examination.		
<u> </u>	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		on of your wish to participate in hearing your request to participate.		
No, I do not wish to participate in hearing session(s)				
Yes, I wish to participate in	n 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:				
	066-11-0	Part A Reference:		
	Office Use Only	Part B Reference:		

There has been considerable pressure placed on nearby residents to the proposed sites to accept the proposals put forward in the various drafts of the Local Plan Review, and they have not been adequately represented by locally elected Paarish and County Council official and Members. It is considered essential that the wishes of local people, who will be those most affected by the proposed development, should be heard.

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examination	1.		
Signature:	Owen Fisher	Date:	23/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



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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	document does this representation relate?	
Paragraph: Po	olicy: SP11 Site: STC002/P58a Policies Map: 3	
Q3. Do you consider the Shropshire Local Plan is	Regulation 19: Pre-Submission Draft of the	
A. Legally compliant	Yes: No:	
B. Sound	Yes: No: 🗸	
C. Compliant with the Duty		
Q4. Please give details of Draft of the Shropshire fails to comply with the If you 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.  If compliance or soundness of the Regulation 19: Pre-Submission Draft its compliance with the duty to co-operate, please also use this box to	
set out your comments.	The compliance with the duty to co operate, please also use this sox to	
and Policy SP11 the land from G strated. There so the proposal Stanmore are no	seed for employment development at Stanmore are located in the Green Belt sets out to protect the Green Belt. The proposed allocation would remove Green Belt protection without any exceptional circumstance being demonis no indication of which businesses might wish to locate at Stanmore, and appears to be a device to ensure that future development proposals at ot subject to the limitations imposed by Policy SP11, that is, that proposals strate that 'very special circumstances' exist.	
	s that the Green Belt will be protected in accordance with national policy. is to protect green belts from 'inappropriate development'. Inappropriate de-	

velopment 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 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. lease of 11.5ha of land from the Green Belt at Stanmore for use for industrial or storage purposes, and the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites.

The proposed release of land from the green belt has not been justified, and the need for the land to be made available for employment development has not been evidenced. It is likely that, if approved, this allocation would be used for further unjustified incursions into the green belt in the future.

(Please continue on a separate sheet if necessary)

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

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(Places continue on a congrete cheet if necessary)

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	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)

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:

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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examination	1.		
Signature:	Owen Fisher	Date:	23/02/2021
		•	

Office Use Only	Part A Reference:
	Part B Reference: