

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:	Judith Wilson
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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: Policy: Site: Policies Map:

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.

I submit that the draft Local Plan is not legally compliant as neither the process of community involvement as required by Shropshire Council's "Statement for Community Involvement for Shropshire (2011)" (SCI) nor the principles set out in R v Brent London Borough Council, ex parte Gunning (1985) 84 LGR 168 (the "Gunning Principles") have been adequately followed.

Bridgnorth Plan Steering Group was established with encouragement from Shropshire Council (SC), and with the support of Bridgnorth Town Council, Tasley Parish Council, Bridgnorth Chamber of Commerce and other local organisations and businesses and local residents. It meets the indications of types of consultees in the SCI and responded constructively to the Regulation 18 Consultation. With regard to the 'Guiding Principles' in the SCI (paragraph 2.5):

- SC has not 'engaged in a timely and constructive manner'. There have been a series of consultation exercises, but comments from the local community, including those from Parish Councils and the BPSG, have been ignored and have not been responded to. The concept of a Tasley Garden Village was only revealed in April 2020, and the promoters

carried out just one month's consultation, closing on 3rd June 2020. This occurred during the COVID-19 pandemic and only consisted of a video conference meeting called at short notice, in which most residents found they were unable to participate. Shropshire Council then opened the Regulation 18 consultation to submissions on 3rd August. This is too short a period for consideration of such a significant change. No Community meetings or events were held by Shropshire Council.

- With regard to constructive consultation, submissions from the local community have consistently expressed concern that a full infrastructure plan, showing deliverability and funding, is needed for a proposal on this scale. I cover the lack of such a plan in a separate form. Here I note that the submissions made have not even been acknowledged, demonstrating a total lack of constructive consultation. Other examples can be provided to the Examiner for most stages of the consultation.
- SC only held one community consultation meeting around Bridgnorth during the first regulation 18 consultation, no meetings were held at the second regulation 18 stage and none at regulation 19. The outputs of the consultations seem not to have been considered, and nor have results from the communication meetings and surveys carried out by BPSG. SC has used over-structured methods to receive submissions, for what appears to be administrative convenience. As a result, lines of consistent argument that have been advanced have been broken into isolated comments on individual paragraphs of draft documents. I consider that the methods used to inform and engage communities in the planning process have been totally inadequate.
- SC have proposed large-scale development around Bridgnorth at short notice. I do not consider that recent consultation has been proportionate to such a significant change in the proposal, and I believe that a majority of residents have not been aware of each stage of consultation.
- SC has only provided tabulations of submissions to the Regulation 18 consultations. However, the SCI requires SC to 'provide information on how people's views have been handled, including reporting back to communities ...' It is evident that providing a summary of submissions does not begin to meet this commitment. As one example, how have the comments that there is inadequate planning for infrastructure and highways been handled?

With reference to the Gunning Principles:

- There should be sufficient information for intelligent consideration. Information on the Tasley Garden Village itself was limited to outline plans and what we consider to be 'publicity material'. Much of the content was incorrect, such as providing adequate pedestrian links and cycleways to the town centre and the level of highways improvement required.
- There should be adequate time for consideration and response. This has not been adequate as discussed above.
- 'Conscientious consideration' must be given to the consultation responses before a decision is reached. No evidence has been provided to show that consultation responses have been taken into account. We would expect a written summary of key lines of objection and an explanation of how each has been handled, especially for such significant, and late, changes to the draft Local Plan

In addition to the above, I consider that important questions raised at the Shropshire Council Cabinet meeting held on Monday 7th December 2020 (item 7) were evaded, and that members were not provided with necessary reports, so that the decision to approve the draft regulation 19 Local Plan was ill-informed. For more information see a letter from the Chairman of BPSG to Councillor Robert Macey

Office Use Only	Part A Reference:
	Part B Reference:

(https://bridgnorthtownplan.weebly.com/uploads/9/0/5/9/90599027/robert_macey_20_12_13.pdf), which he has not acknowledged or replied to. We consider that this is typical of the level of cognisance given by SC to feedback from the local community.

On the point of legal compliance, it may also be noted that the present proposals for the Tasley garden village (or the former proposal for a garden village at Stanmore) would increase massively vehicle movements and make the town centre yet more congested. Shropshire Council is already in breach of legal requirements which set limits on pollutants in the atmosphere in two locations in Bridgnorth town centre. The proposals would actually increase the extent of that failure. HM Assistant Coroner for Inner South London, Philip Barlow, recently ruled that the appallingly sad death of Ella Adoo-Kissi-Debrah who died at 9 years of age from acute respiratory failure and asthma was attributable to "air pollution exposure". This is the first time that a Coroner has found that air pollution was a contributory cause of illness and death. Shropshire Council might potentially be held liable under Human Rights legislation if the Draft Plan was implemented and the almost certain increase in air pollution was linked to illness and/or death. Notwithstanding the fact that the manufacture of petrol/diesel vehicles will be banned from 2030, realistically there will be still many millions of such vehicles on the road probably well into the 2030s.

(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.

I propose that the plan is modified, in line with the proposals in the 1st Edition of the Bridgnorth Plan, which is consistent with submissions from Bridgnorth Town Council and Tasley Parish council.

In brief, this recommends that the scale of development around Bridgnorth be set to meet need until about 2032, providing for sufficient dwellings to meet the need for a 10-year land bank, and that a new Site Assessment be carried out for longer-term needs, giving the opportunity to demonstrate that SC's SCI has been revisited and its requirements met.

(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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	Part B Reference:

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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:

(Please continue on a separate sheet if necessary)

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Signature:

Date: 26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Judith Wilson
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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
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Q2. To which part of the document does this representation relate?

Paragraph:	Appendix 6	Policy:	S3.1	Site:	STC002/P58a	Policies Map:	3
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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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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 surrounded 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 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.

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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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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:
	Part B Reference:

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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Date:

26/02/2021

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Representation Form

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Part B: Representation

Name and Organisation:	Judith Wilson
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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:	<input type="text"/>	Policy:	<input type="text"/>	Site:	<input type="text" value="Bridgnorth"/>	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 checked="" 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 checked="" 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.

I consider that the plan has not been justified as an appropriate strategy. It has not been demonstrated that all reasonable alternatives have been considered, and sufficient, proportionate credible evidence has not been provided. Many strategic documents are missing or lacking credible evidence. I therefore consider the plan to be "not sound".

In its submission to the Regulation 18 consultation and other submitted documents, Bridgnorth Plan Steering Group (BPSG) provided a reasonable alternative for the Bridgnorth area. They have received no communication or other feedback to indicate that this has been considered.

For the Local Plan to have been justified as an appropriate strategy based upon credible evidence they previously asked that the following should be included in the evidence base, and they have not been made available:

- A Local Housing Needs Assessment for the Bridgnorth place plan area. Without this consultees cannot come to an informed decision on the proposed amount of housing for the area. A decision regarding the appropriateness of the plan cannot therefore be formed.
- A justification for the level of growth in employment assumed in the draft Local Plan.
- A justification for the allocation of 1800 proposed dwellings in the Bridgnorth Place Plan area, which appears arbitrary. About 500 of the dwellings are saved SAMDev allocations.
- The plan fails to provide credible evidence demonstrating how the significant shortfalls in the delivery of jobs, housing and businesses will be addressed from the previous plan period.
- A local Economic assessment of the Bridgnorth place plan area is missing.
- A justification for the Unitary Authority allocating 30,800 homes, when the housing need assessment carried out by Shropshire Council (Local Housing Need 2020) indicates that 25,894 are required.
- The evidence base is missing relevant information regarding provision of single occupancy dwellings as compared to Office for National Statistics sub-National Housing Projections (2014 based), which predicts a significant proportion of growth will be associated to single households.
- A strategic highways assessment for the Bridgnorth area, including an explanation of how Bridgnorth can be part of the Strategic Transport Corridor which is a central strategic plank of the draft Local Plan. The latest draft of the Local Plan states that a highways assessment will be carried out. However, we consider that the draft Local Plan cannot be sound without the inclusion of such an assessment in the evidence base.
- An Infrastructure Plan, which we would expect to cover the necessary infrastructure to support the proposed level of growth.
- No credible evidence has been made available demonstrating that sustainable growth, addressing Bridgnorth's low level of employment self-containment, would result from the planned housing and employment land allocations. 757 dwellings were delivered between 2006 and 2019 and whilst there has been some delivery of employment land (on a much lower scale than is now proposed) it is unclear whether local employment has kept pace with household growth. 643 homes provided for under SAMDev remain to be delivered up to 2026 and there remains a significant shortfall in employment delivery.

Reasonable alternative plans have been shared with Shropshire Council however:

- Shropshire Council have not engaged with the community when asked to during the Regulation 19 and previous Regulation 18 consultation, no community meetings have been held.
- There is no evidence that Shropshire council have constructively considered the viable alternative that BPSG shared at the Regulation 18 consultation.
- There is no evidence that community responses to both Regulation 18 consultations have been fully considered.

Lack of realistic credible employment land allocation

- Evidence demonstrates from SAMDev for Bridgnorth place plan area that little employment land has been delivered over the previous plan period. The Regulation 19 strategy provides no credible evidence as to how the proposed new supply will be delivered or can be delivered set against existing allocations. This is missing from the Viability assessment.

(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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Shropshire Council must provide all credible evidence that is missing before Cabinet and Council are asked to submit the Local Plan to the inspectorate. The strategy selected must be backed up with proportionate credible evidence justifying the strategy, all alternatives must be considered and Shropshire Council must demonstrate that the selected strategy is truly community led.

I recommend that the plan is modified, in line with the proposals in the 1st edition of the Bridgnorth Plan, which is consistent with submissions from Bridgnorth Town Council and Tasley Parish Council.

In brief they recommend that the scale of development around Bridgnorth be reduced over the plan period 2019 to 2036 to no more than 1000 dwellings in total (including the approximately 500 dwellings already included in SAMDev), no single site is selected, and the Regulation 18 is repeated ensuring community involvement.

I also believe that STC002 and P58a must be removed from the plan as these employment allocations are in excess of what Bridgnorth needs.

(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:

I hope that my concerns that the draft Local Plan is not Sound can be dealt with, preferably by amending the Draft Plan in the way proposed above.

(Please continue on a separate sheet if necessary)

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Part B: Representation

Name and Organisation: Judith Wilson

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: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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(Please tick as appropriate).

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I submit that the plan has not been **positively prepared**, and is therefore not sound, because:

- The housing need for the Bridgnorth Place Plan area has not been objectively assessed. A Local Housing Needs Assessment has not been carried out for the Bridgnorth Place Plan area. Without this, I consider that the best available assessment for housing need around Bridgnorth remains that produced by Bridgnorth District Council in 2006. Bridgnorth Plan Steering Group extrapolated this to 2036 in the BPSG 'Consultation Document', which was sent to Shropshire Council, reaching the conclusion that 15,168 dwellings would be needed by 2036, compared to the 16,200 dwellings proposed by the version of the Local Plan at the time. They have received no feedback on this (or any other of their other inputs) from Shropshire Council. They did not repeated the analysis since the Local Plan was extended to 2038, but the housing need for the Bridgnorth area has not been recently assessed, and therefore cannot have been objectively assessed.

- A 'Statement of Common Ground' has not yet been agreed with other Local Authorities, under the Duty to Cooperate. This would include agreement on the housing needs of adjacent and other local authorities and the extent to which they anticipate not being able to meet them. I understand that not all the other local authorities have completed their own housing needs assessments. Paragraph 2.27 of the draft Local Plan confirms that discussions have been held but that Statements of Common Ground will only be available when the plan is submitted for Examination. They have not been available for consideration as part of the Regulation 19 consultation. Shropshire Council has decided to allocate an additional 1,500 dwellings to meet the needs of other Local Authorities, including the Association of Black Country Authorities (ABCA). None of the members of the ABCA are directly neighbouring authorities to Shropshire. It is clearly more appropriate for Telford and Wrekin Council to contribute to this housing need as that new town is still substantially below its target population of 220,000 (and also has significant areas of available employment land). It is further understood that Telford and Wrekin rejected a request from ABCA to take an allocation of housing need because of lack of evidence. Furthermore, I can find no evidence that any financial contribution has been agreed with these authorities to cover the additional infrastructure costs that will be needed to provide for the additional 1,500 dwellings. Again, without this information I consider that the Local Plan has not been positively prepared or objectively assessed.

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Shropshire Council should reduce the housing requirement for Shropshire by removing the allocation for ABCA under the Duty to Cooperate. The Local Housing needs assessment for Bridgnorth Place Plan area must be carried out. Under the Duty to Co-operate a Statement of Common Ground is required and I consider that Telford and Wrekin authority must be approached to assess if the need for housing and employment can be met more sustainably by Telford and Wrekin Authority. Information already provided by BPSG and Save Bridgnorth Greenbelt group, and others, should be taken into account, and shown to have been taken into account, during the plan-making process.

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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S3.1"/>	Site:	<input type="text" value="STC002/P58a"/>	Policies Map:	<input type="text" value="3"/>
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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 development 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.

(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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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: 26/02/2021

Office Use Only	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: Representation

Name and Organisation:	Judith Wilson
------------------------	---------------

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: Site: Policies Map:

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.

I consider that the plan is not effective. I do not feel that there is evidence that the plan is deliverable over the plan period.

The plan includes proposals for a level of development of homes and employment land in the Bridgnorth area which appear to be well in excess of previous delivery levels, and I am unable to identify evidence that there is the market capacity in Bridgnorth to absorb the proposed level of development. Further, at the time of the Regulation 19 Consultation there is no infrastructure plan available and a Strategic Transport Assessment for the Bridgnorth area has not yet been carried out and reported. The lack of an infrastructure plan or strategic transport assessment means that it cannot be evidenced that the local infrastructure is adequate to support sustainable delivery of the proposed level of development, nor that necessary improvements can be provided through infrastructure contributions from development.

Housing development

The level of new homes proposed for the period 2016 to 2038 for the Bridgnorth area is 1,800 homes. However, Schedule A5(i) to the draft plan indicates that the number of housing completions in the area for 2016 – 2019 was 52, so 1,748 homes would have to be delivered in 19 years. This is an average delivery rate of 92 per year. In reality, there appears to have been little development in 2019 to 2021 to date, and the allocations made for the period 2016 – 2026 under SAMDev have not so far progressed to the planning application stage, so the actual rate at which homes would have to be built and occupied would need to be higher than 92 per year if the planned level of housing growth is to be delivered.

Shropshire Council's Authority Monitoring Report for 2017 - 18 indicates (Table 7) that there were 728 net dwellings completed in Bridgnorth in the 10 years to 2016 i.e. 72.8 per year. Achieving the draft Local Plan's aspiration for Bridgnorth for 2020 - 2038 would require an uplift of at least 26% on the rate of past delivery. I have not seen evidence to support the proposition that the local housing market can sustainably support a markedly higher level of delivery than has been achieved in the past, in competition with other centres.

Whilst the Shropshire viability study (HDH Planning and Development, July 2020) does test the financial viability of potential development of both the Tasley and Stanmore Garden Village proposals as 2 of 7 "strategic" housing sites, and suggests that they may be financially viable, this is subject to the caveat (para 10.83) that "In considering these it is important to note that the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites" and gives a "best estimate" of the amount of infrastructure contribution required. It appears to me that the evidential value of this assessment in supporting a contention that these sites are deliverable within the plan period is low in the absence of an infrastructure plan and (in particular) a strategic transport assessment for the Bridgnorth area.

Employment development

The level of employment development proposed for 2016 – 2038 for the Bridgnorth area is not clear. 49Ha of employment land is proposed to be made available "to create choice and competition in the market" (S3.1 para 1). This appears to comprise 13.3Ha (net developable) allocated under SAMDev (albeit that part of this is for the relocation of the existing livestock market, enabling its site to be developed for other purposes), 11.4Ha of Green Belt land adjacent to Stanmore Industrial Estate, and 16Ha employment land at the proposed Tasley Garden Village. It will be noted that these do not total 49Ha and Schedule A6 gives a figure of 37.7Ha as the employment "strategic land supply 2016 – 2038" for Bridgnorth. This nevertheless comprises 9.1% of the county's total. By contrast, the residential development guideline for Bridgnorth is 5.8% of the county total.

Table 18 of the Shropshire AMR 2017-18 indicates completed employment development for Bridgnorth of 6.5Ha for the 11 years 2006 – 2017 (average 0.6 Ha p.a.). It is claimed in the AMR that "It is anticipated that Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development".

I have seen no evidence to suggest that Bridgnorth is an attractive location for new employment development and would be concerned about whether this is realistic given the town's relatively weak connectivity.

It is noted that the Shropshire Viability Study (HDH Planning and Development, July 2020) indicates the Office and Industrial development are generally considered NOT VIABLE in Shropshire on either Green Field or Brown Field sites (albeit that the viability calculation for "larger industrial" development on green field sites is marginal – Viability Study Appendix 18). Para 12.84 of the study states:

"To a large extent the results are reflective of the current market. Office development and industrial are both shown as being unviable, however this is not just an issue here, a finding supported by the fact that such development is only being brought forward to a limited extent

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Part A Reference:

Part B Reference:

on a speculative basis by the development industry. Where development is coming forward (and it is coming forward), it tends to be from existing businesses for operational reasons, rather than purely for property investment reasons.”

Whilst hotel, prime retail, supermarket and retail warehouse type developments appear to be viable on either green or brown field sites in Shropshire, it is understood that the proposed new employment land allocations are not intended to be substantially developed for these purposes. It is noted that it is stated that the saved SAMDev allocations include a suggestion of a hotel at BRID001 & 020b, and offices, industrial and warehouse uses at ELR011a.

Unlike the proposed new housing allocations, separate viability calculations have not been published for the proposed allocations for employment development at Stanmore and Tasley Garden Village. In reality, the employment elements of the Tasley Garden Village scheme is part of a mixed use allocations, whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure.

In summary, I consider that there is insufficient evidence to support the proposition that the planned level of development in the Bridgnorth area is deliverable over the plan period.

(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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Overall, evidence of deliverability of development on the scale proposed for Bridgnorth is required, or a reduction in the scale of development to nearer historically established levels alongside a review of the infrastructure (including transport) required to support any revised proposals. The actual level of overall new employment development proposed for the Bridgnorth area should be clarified.

Appropriate evidence of deliverability which would need to be provided would include:

- 1 Evidence of the market capacity to absorb significantly higher levels of both housing and employment development than has been achieved in the past in the Bridgnorth area. If this can not be achieved then STC002 and P58a must be removed from the plan.
- 2 The ability of local infrastructure across the Bridgnorth area (such as transport and movement) to support development on this scale and to integrate it successfully into the Town and wider transport network should be critically examined and an appropriate infrastructure investment plan produced with sources of funding clearly identified.
- 3 A detailed statement of what infrastructure contribution the Garden Village proposals would be required to make should be produced.
- 4 Viability calculations for the Garden Village developments should be re-visited so that they clearly include both the housing and employment elements and should be accompanied by a statement of what planning obligations would be expected to ensure delivery of the employment elements alongside policy compliant housing provision.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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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)

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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Signature:

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Judith Wilson
------------------------	---------------

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="SP1"/>	Site:	<input type="text" value="STC002/P58a"/>	Policies Map:	<input type="text" value="3"/>
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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 checked="" 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 checked="" 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 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. In addition, paragraph 137 of the National Planning Policy Framework requires a Local Planning Authority to demonstrate "fully evidenced and justified" exceptional circumstances in order to remove land from the Green Belt and this has clearly not been done.

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

(Please tick one box)

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Signature:

Date:

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Part A Reference:

Part B Reference:

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Part B: Representation

Name and Organisation:	Judith Wilson
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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:	<input type="text"/>	Policy:	<input type="text" value="SP10"/>	Site:	<input type="text" value="STC002/P58a"/>	Policies Map:	<input type="text" value="3"/>
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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 checked="" 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 checked="" type="checkbox"/> |

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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 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 rest of the rural area of the County are, have not been justified and the need for the proposed allocation has not been properly evidenced.

(Please continue on a separate sheet if necessary)

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

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

(Please tick one box)

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Representation Form

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Part B: Representation

Name and Organisation:	Judith Wilson
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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:	<input type="text"/>	Policy:	<input type="text" value="SP11"/>	Site:	<input type="text" value="STC002/P58a"/>	Policies Map:	<input type="text" value="3"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
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| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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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 Planning Policy Framework says, at para 145, that local planning authorities should regard the construction of buildings as being “inappropriate” on a green belt, unless they are for certain, specified, uses – none of which include new development for industrial purposes. The release of 11.5ha of land from the Green Belt at Stanmore for use for industrial or storage purposes, and the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites.

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

(Please continue on a separate sheet if necessary)

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

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

(Please tick one box)

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	Part B Reference:

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