

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	Save Bridgnorth Greenbelt/Hobbins Management Co. Ltd.
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):

Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s). Please be as precise as possible.

Please see the attached statement.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

No, I do not wish to/consider it necessary to participate in hearing session(s)

Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

Shropshire Local Plan

Objection by Save Bridgnorth Greenbelt and Hobbins Management Co Ltd

Housing and Employment Topic Paper

“Save Bridgnorth Greenbelt” and the “Hobbins Management Co. Ltd.”, submitted representations at the time of the Regulation 19 consultation in May 2022. They objected to the proposals in the Plan as far as they related to extensions to the employment site at Stanmore.

The additional Information set out in the current consultation exercise based on updates of

- i. the Housing and Employment Topic Paper (GC45),
- ii. the Green Belt Topic Paper (GC46) and
- iii. the Additional Sustainability Appraisal Report (GC44),

provides nothing that would cause the two parties to withdraw or modify their objections to the Plan but, if anything, causes greater concern about the unnecessary and unjustified loss of Green Belt land at Stanmore.

The objections contained in this statement should be read in conjunction with those earlier submissions. The objections of the two parties remain as strong as ever. In essence, the objections relate to:

1. The proposed allocation of Sites STC002 and p58a at Stanmore for employment purposes, when further land for employment uses is not needed at Stanmore.
2. The removal of the land covered by Sites STC002 and p58a from the Green Belt without proper consideration of alternate sites and without exceptional circumstances that would justify the loss to the Green Belt being established.

The objectors consider that the proposal to allocate Sites STC002 and p58a at Stanmore and within the Green Belt for employment development will cause the Plan to be unsound because:

- i. The proposal is not consistent with national policy.
- ii. The proposal will not be effective because the outcome that the Council seek cannot be guaranteed to be delivered within the Plan period.
- iii. The proposal is not justified because it is not based on appropriate robust evidence and consideration of detailed alternatives.

They would like to see the two allocations deleted from the Plan and the land kept as open countryside and given the protection afforded by Green Belt status.

This objection is to the proposed allocation of two Sites, p58a and STC002, as employment sites in the Draft Plan. Paragraphs 8.7 and 8.8 of the Housing and Employment Topic Paper set out the

proposal. These sites are located within the West Midlands Green Belt and there is no justification or necessity for their removal or development.

It is important to appreciate how the two sites that are the subject of this objection, i.e. Sites STC002 and p58a, came to be allocated for development in the first place.

When first proposed for development the sites formed part of a much larger proposal aimed at creating a new village at Stanmore. The proposed development would have established a village for between 800 and 1000 new homes, together with land for employment uses, a primary school, and shopping, community and leisure uses. Site p58a was shown as being a site for employment development, the majority of which would be industrial uses. Site STC002 was shown as part of a larger area of 'mixed uses.' All the land for the new village was within the West Midlands Green Belt, and all the land would have had to be removed from the Green Belt in order for the development to take place. Large areas of land adjacent to the village were to be safeguarded for future use.

Certain areas of land that had been allocated for employment development were to be retained in the proposals for Bridgnorth, but no other new sites for employment in Bridgnorth were shown to be allocated for the use.

It was intended that the new village would be largely self sufficient for day-to-day needs. While the development was regarded as being a new settlement it was, nevertheless, included within the Bridgnorth development boundary, albeit separated from the town by a landscaped green 'wedge'.

An alternative proposal was put forward at a fairly late stage in the early consideration of the Local Plan Review. This proposed a large development at Tasley, an area to the west of Bridgnorth, which could provide the same level of development as that which had been proposed at Stanmore but, as Tasley does not lie within the Green Belt, there was clearly no need to remove land from the Green Belt in order to implement the development. The proposal for the development at Tasley was chosen in preference to that at Stanmore, and was included in the later drafts of the Review. The Tasley development is now regarded as a Sustainable Urban Extension rather than a new village, as it will be situated immediately adjacent to the existing development in Bridgnorth and not separated from it as Stanmore was to be.

The proposed new village at Stanmore was dropped, but Site p58a was retained as a proposed employment site and Site STC002 was reallocated for employment development. The existing development at Stanmore together with Sites p58a and STC002 were shown lying outside the Bridgnorth town boundary.

It is clear that sites p58a and STC002 were identified for employment and mixed uses respectively to help provide land for employment for the occupants of what was intended to be the residential areas of Stanmore new village. When the proposals for the new village with its 800–1,000 new dwellings were dropped the need for employment development at Stanmore should, logically, also have been dropped. If additional provision for employment uses was necessary it would have been logical to site it as close as possible to the newly proposed housing at Tasley. In fact, the site at Tasley that has now been included for employment development, was already allocated for such development in the SAMDev Plan and has been carried forward into the Local Plan Review.

Now that additional housing is proposed in the present consultation draft of the Plan to be sited at Tasley (an additional 600 units) it would, again, be logical to site new employment development as close as possible to those dwellings in order to reduce the need to travel significant distances to

work. By allocating Sites p58a and STC002 at Stanmore for development cross town travel will have to increase, making the proposed development at Stanmore a less sustainable proposition.

Para. 16.97 – 16.100 of the Housing and Employment Topic Paper make it clear that the proposed employment sites at Stanmore are not considered to be suitable to accommodate employment land that is needed to assist with accommodating the 30ha of employment land that is needed to assist the needs of the Black Country authorities – all that land being proposed to be sited in Shifnal. This is partly because of the poor connectivity with the Black Country in terms of inadequate road connections and total lack of railway links. The development at Stanmore, then, must only be required to provide for local needs.

That being the case, siting the employment development that is proposed to take place at Stanmore on the same side (to the west) of the River, close to the existing main development areas in Bridgnorth and where the proposed new housing development is to take place, is the logical location.

There is no explanation in the Housing and Employment Topic Paper as to why an extra 600 dwelling can be accommodated at Tasley, but there is no corresponding addition to the employment provision in that area. Adding 600 houses to the 1,050 already proposed would be a 57% increase in the housing allocation, but that is not replicated in the employment allocation for the Tasley area, though there is no lack of land. A 57% increase in the land at Tasley for employment would mean an additional 9ha. to add to the 16ha. already planned. Such an allocation would remove any need for extending the Stanmore Industrial Estate, and thus no more Green Belt would be lost.

The demand for further employment development at Stanmore is also highly questionable. The Stanmore Estate was developed from the remnants of a former RAF establishment. In total some 18ha. were given over, in the 1960's, to employment use. So, it has taken nearly 60 years to reach the level of accommodation that presently exists at Stanmore on 18ha. Some of that original 18ha. has not yet been developed. There can be no guarantee that a further 11.5ha., a 64% increase over the original 18ha. will be taken up within the Local Plan Review period up to 2038.

In more recent times there has been a discernible slow-down in the provision of new industrial facilities at Stanmore, and, for that matter, in Bridgnorth generally. This may be due to a number of factors, for instance, changes in demographics with an increasingly ageing population, changes in occupations with a more service and leisure/hospitality focus, or perhaps more directly, the increasingly rapid growth of Telford which has far superior road and rail links with the West Midlands and is more centrally placed in relation to other areas of Shropshire.

The fact that none of the land allocated in the SAMDev Plan for employment at Tasley and which is owned by the same organization as the land proposed for development at Stanmore has yet been brought forward has already been referred to, but there are other industrial areas within the town which have significant areas of undeveloped land, even though they are already serviced and have no other restrictions.

There is, at present, no shortage of land that could be developed for industry in Bridgnorth if the demand existed.

The Council have repeated at several points in the Housing and Employment Topic Paper, and again in the Green Belt Topic Paper, that Stanmore industrial Estate is a “centre of excellence for engineering and advanced manufacturing”. That, however, is sadly not the case. The main operator on the Stanmore site is “Grainger and Worrall”. They were, indeed, leaders in automotive engineering.

However, automotive engineering is moving forward and the Company has had to react. Its very significant workforce has been halved in the recent past, and it remains in difficulty despite a Management buy-out. The other major innovator on the site was the "Marches Centre for Manufacturing and Technology". This, however, relocated a couple of years ago, to Telford, in part due to the inconvenience of the road network that serves Bridgnorth. It has now been taken over by Shropshire and Telford and Wrekin Councils.

The "Centre of Excellence" does not exist any longer, with many of the current operators on the site being similar to those that may be found on any employment sites in the Country. The attached list of Companies currently operating from Stanmore illustrates the position. There are several car repair enterprises, and a growing incidence of service providers and non- industrial operators.

The above being the situation, there can be no certainty that there will be a need for a further 11.5ha. of land at Stanmore to be developed in the Plan period up to 2038. At present the two sites at Stanmore (i.e. p58a and STC002) are shown in Appendix 7 to the Draft Local Plan to come forward beginning in 2020/21 and being completed by 2030.

That seems highly unlikely given the slow rate of growth at Stanmore over the past 50 years and the current difficulties in the general economy of the Country.

There is no need or demand for the proposed development at Stanmore, and it will achieve little other than increasing journeys, almost certainly by private cars and heavy trucks, across the town and up the steep climb out of Bridgnorth on the A454. The development would however, mean the destruction of 11.5ha.of Green Belt which cannot be justified in terms of necessity.

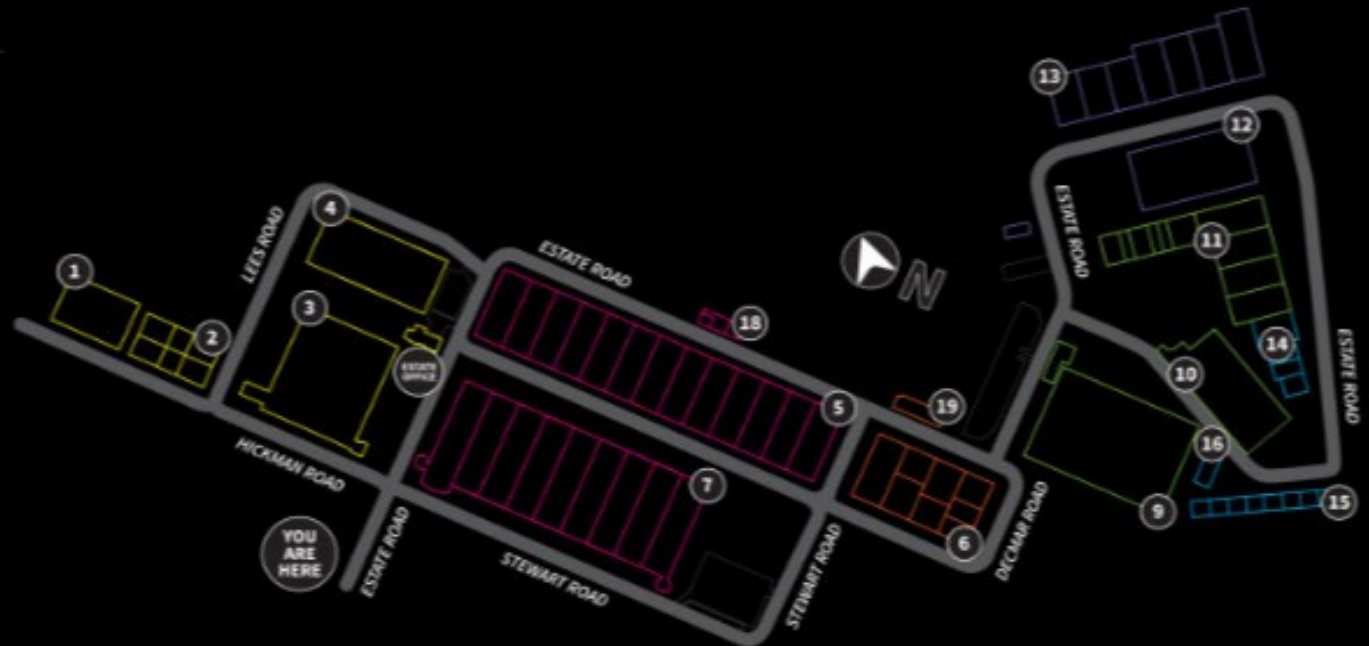
It is requested that the Sites in question, p58a and STC002, should be deleted from Plan and that the land should remain as Green Belt.

	Building number	Unit	Company name	Sector	Companies house link		
1		1	Coram	Showers			
2		2	Jenvey Dynamics Limited	Manufacture of other parts and accessories for motor vehicles	https://find-and-update.company-information.service.gov.uk/company/02155855		
			Protec Auotomation	Automotive repairs			
		1	Body beautiful (cars)	Car repairs			
3		3	Polytech group	Automotive , looks like warehouse			
4		4	Coram Showers				
5		5 7a	The Special Cider Company Limited	drink	https://find-and-update.company-information.service.gov.uk/company/10402711	https://find-and-update.company-information.service.gov.uk/company/12989559	
			M & J JACKSON PROPERTIES LIMITED				
		4	Grainger & Worrall				
6		6	7 DGC Engineering UK Limited	Manufacture of other mac	https://find-and-update.company-information.service.gov.uk/company/04651658		
		8	Ditton Fabrications	Engineering			
		2	Frisby couriers	Transport & Freight			
		6	Midland performance & Retero	Car repairs			
		3	stinky ink	Printer cartrig retail			
		5	T3D Engineering	Engineering			
		1	Churchill Integrated Services Ltd	facilities support activities	https://find-and-update.company-information.service.gov.uk/company/08221434	https://find-and-update.company-information.service.gov.uk/company/13830354	
7		7	1 Grainger-Worrall-limited,Grainger & Worrall Machining Li	Engineering	https://find-and-update.company-information.service.gov.uk/company/00980487	https://find-and-update.company-information.service.gov.uk/company/04776147	
			Evolution Castings Group Limited		https://find-and-update.company-information.service.gov.uk/company/14786291		
			Ecg Partner Share Scheme Limited		https://find-and-update.company-information.service.gov.uk/company/15242394		
9		9	Classic Motor Cars Limited	automotive restoration, sa	https://find-and-update.company-information.service.gov.uk/company/02827121		
			M & H Littleford Limited	letting and operating of own or leased real estate	https://find-and-update.company-information.service.gov.uk/company/13522822		
			Ic Motor Cars Limited	automotive	https://find-and-update.company-information.service.gov.uk/company/07996973		
10		10	SEAL FUELS LIMITED	Domestic Fuels	https://find-and-update.company-information.service.gov.uk/company/07388953/filing-history		

11	11	1A	BRIDGNORTH KITCHEN CENTRE LIMITED	Manufacture of kitchen furniture	https://find-and-update.company-information.service.gov.uk/company/05859373		
		1b	Holden Vintage and Classic	car parts			
		2c	Billingham mot and tyre centre	car repairs & mot			
		4	allimet fabrications				
		3b	Possibly empty				
		5&6	Hydroviron	Chemicals			
12	12		Grainger & Worrall Machining	Engineering			
13	13	1&2	Clive Cowern Transport Services Limited.Clive Cowern Hol	Freight transport by road, warehousing	https://find-and-update.company-information.service.gov.uk/company/04491674	https://find-and-update.company-information.service.gov.uk/company/06086673	https://find-and-update.company-information.service.gov.uk/company/13920893
		7	Flexzon	Vehicle parts			
		5&6	Tvscars Ltd	Sale of used cars and light	https://find-and-update.company-information.service.gov.uk/company/04666637		
14	14	3	Lightwire Electrical Limited,Lightwire Group Limited	Electrical installation	https://find-and-update.company-information.service.gov.uk/company/07541732	https://find-and-update.company-information.service.gov.uk/company/11101065	
		1	pushback	aerosol fillers			
15	15	1	Nutec Automation Ltd	Construction of other civil engineering projects not elsewhere classified	https://find-and-update.company-information.service.gov.uk/company/09821106		
		2	Lux group	wedding items/gifts			
		6	Protein Package	food			
		5	machine and control	engineering			
		8	Inventive Engineering & Design	Engineering			
		7	Sherbert Events	food and events			
		3	TG autos	car repairs			
		4	Direct heat solutions	Plumbind and heating specialist			
16	16		RS fabrication	steel fabricator			
18	18		Helga's Café , Love Mondays Ltd	Recruitment/ food	https://find-and-update.company-information.service.gov.uk/company/08917433		
		b	puppet centre				
19			Laser sport International	Sporting equipment			
	Estate house		Kingsbridge Property Services Limited	Site service	https://find-and-update.company-information.service.gov.uk/company/02623460		
	Media House 9	GF	Mineseeker Foundation	business support service	https://find-and-update.company-information.service.gov.uk/company/04158673		
		GF	Sole Of Africa Limited	business support service	https://find-and-update.company-information.service.gov.uk/company/05736375		

Zones

- ZONE - Buildings 1-4
- ZONE - Buildings 5/7/18
- ZONE - Buildings 6/19
- ZONE - Buildings 9-11
- ZONE - Buildings 12/13
- ZONE - Buildings 14-16



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Please be as precise as possible.

Please see attached statement

(Please continue on a separate sheet if necessary)

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Shropshire Local Plan

Objection by Save Bridgnorth Greenbelt and Hobbins Management Co Ltd

Green Belt Topic Paper

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The additional Information set out in the current consultation exercise based on updates of

- i. the Housing and Employment Topic Paper (GC45),
- ii. the Green Belt Topic Paper (GC46) and
- iii. the Additional Sustainability Appraisal Report (GC44),

provides nothing that would cause the two parties to withdraw or modify their objections to the Plan but, if anything, causes greater concern about the unnecessary and unjustified loss of Green Belt land at Stanmore.

The objections contained in this statement should be read in conjunction with those earlier submissions. The objections of the two parties remain as strong as ever. In essence, the objections relate to:

1. The proposed allocation of Sites STC002 and p58a at Stanmore for employment purposes, when further land for employment uses is not needed at Stanmore.
2. The removal of the land covered by Sites STC002 and p58a from the Green Belt without proper consideration of alternate sites and without exceptional circumstances that would justify the loss to the Green Belt being established.

The objectors consider that the proposal to allocate Sites STC002 and p58a at Stanmore and within the Green Belt for employment development will cause the Plan to be unsound because:

- i. The proposal is not consistent with national policy.
- ii. The proposal will not be effective because the outcome that the Council seek cannot be guaranteed to be delivered within the Plan period.
- iii. The proposal is not justified because it is not based on appropriate robust evidence and consideration of detailed alternatives.

They would like to see the two allocations deleted from the Plan and the land kept as open countryside and given the protection afforded by Green Belt status.

This objection is to the proposed allocation of two Sites, p58a and STC002, as employment sites in the Draft Plan. The proposal to develop the abovementioned sites is set out in paragraph 5.1 of the Green Belt Topic Paper.

Paragraphs 8.7 and 8.8 of the Green Belt Topic Paper set out the proposal, and the purported justification for the allocations. These sites are located within the West Midlands Green Belt and there is no necessity for their removal or development. Objection is made on the grounds that the Topic Paper does not adequately assess the possibility of alternatives to the development proposed within the Green Belt and that the reasons given in paragraphs 8.24–8.26 do not constitute exceptional circumstances sufficient to over-ride the Policy intention to safeguard the Green Belt.

At paragraph 5.11 the Topic Paper refers to paragraph 14 of the National Planning Policy Framework. This states that,

“Before concluding that exceptional circumstances exist to justify changes to green Belt boundaries, the strategic policymaking authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development...”

The Council have indicated at paragraph 5.13 that they comprehensively considered reasonable alternative options. Part of this process is recorded in the Sustainability Appraisal. Comment on that Appraisal is made in another objection by the same objectors.

The first assessment that needs to be made is whether or not the amount of land that has been calculated as being necessary in the Plan period is actually necessary. Paragraph 15.30 of the Housing and Employment Topic Paper says that the Council have identified 413ha. of land for employment purposes. Then, at paragraph 15.47, the council indicate that their chosen Option “will provide for an employment land supply in excess of the proposed employment requirement of 320ha. This is therefore considered sufficient to provide for the uplift of 20ha to deliver the proposed employment land requirement of 320ha.”

This represents a flexibility in the attainment of the figure to achieve the assessed need of 23%, much larger than most flexibility allowances. It is suggested that the reduction of this figure by the amount of land allocated at Stanmore (11.5ha.) in order to achieve a local and national policy objective, that is protecting the Green Belt, should be a serious consideration.

Further, it does not appear that the exercise actually involved examining the possibility of developing other individual sites, perhaps a larger number of smaller sites. Unless that has been undertaken, it is very difficult to be ascertain that all possibilities for reasonable alternatives have been exhausted. It is difficult to believe that other sites of 11.5ha or less do not exist in the near vicinity of Bridgnorth.

The consideration of whether exceptional circumstances that might justify inappropriate development in the green belt exist then comes under consideration if it is found that no suitable alternatives actually exist. The objectors are not convinced that that first consideration has been fully considered.

Nevertheless, it is appropriate to consider the “exceptional circumstances” that the Council have identified in paragraph 8.24 - 8.26 of the Green Belt Topic Paper. The objectors have already commented upon the “exceptional circumstances in their earlier Regulation 19 submissions, but they are now detailed a little more in the current Topic Paper. They trust that the Council and the Inspectors will give their earlier comments appropriate consideration.

In general terms, however, the “exceptional circumstances” listed by the Council do not appear to the objectors to be particularly “exceptional”. They are the sort of considerations that many businesses have to take into account in the running of their commercial enterprise.

To comment, briefly, on each “exceptional circumstances” that the Council have identified in paragraph 8.26 of the Topic Paper:

a. Supporting the role of Stanmore Business Park.

While the Council assert that Stanmore Business Park (the change to Business Park is in itself significant and shows that the emphasis is moving away from Industry) is a key employment location for Bridgnorth and Shropshire, they do not detail just how important it is. Local knowledge suggests it is far less important than the Council believe and that its importance is reducing both locally and in terms of effect on the south-eastern part of Shropshire, partly due to the growth of importance of Telford, which the Council does not appear to appreciate.

The Council continues to assert that Stanmore is a centre of excellence for engineering and advanced manufacturing, but this is no longer the case, and the attached list of companies operating from the Estate shows the growing number and diversity of the operators. There is a growing service sector, and a reduction in advanced engineering.

The Council have produced no evidence of high occupancy rates but will know that recent planning permissions for the development of sizeable areas of land have not yet been taken up and if not commenced soon will lapse. Given the very slow nature of the development of the site there is no guarantee that the newly proposed sites will be quickly taken up. The only “evidence” on the matter has come from the Estate’s Agent.

There is nothing exceptional in this situation, and no evidence to support what the Council claim.

b. Supporting the medium and long term needs of existing businesses on Stanmore Business Park.

It is true that a large number of companies operate from Stanmore, but that does not mean that there are no empty units on the site or that the accommodation is unsuitable for new businesses or for existing businesses wishing to expand. There is scope within the existing boundaries of the site to allow for expansion. The greater problem, though, is that some of the companies, particularly those in advanced engineering are contracting and that will inevitably result in more available floorspace.

The Council have not produced any figures to demonstrate that high-occupancy rates are causing a problem for existing operators. The only “evidence” has come from the Estate’s Agent and has not been made available to the public to check.

There is nothing exceptional in this situation, and no evidence to support what the Council claim.

c. Attracting new businesses.

The Council, again, indicate that Stanmore is a centre – locally and regionally - for excellence in engineering and advanced manufacturing. But this aspect, which had been centred on products for petrol motor vehicles, is in decline. A number of car repair workshops now operate from the site but that does not mean that the site is a centre for engineering excellence.

The Council have produced no evidence to support the claim that new advanced manufacturing enterprises are being turned away because of lack of available space on the site. It is just as likely, if not more so, that such enterprises are looking more towards Telford where land is cheap and readily available with good transport links with the West Midlands.

There is nothing exceptional in this situation, and no evidence to support what the Council claim.

d. Supporting the Strategic Role of Bridgnorth.

The claims made under this heading in paragraph 8.26 appear to repeat the claims and reasons set out in the other “exceptional circumstances” listed. The information does not add to anything that has been set out in the other circumstances, and is again, totally un-evidenced.

Again, there is nothing exceptional in this situation, and no evidence to support what the Council claim.

e. Supporting the Aspirations of the Economic Growth Strategy and the Marches Local Enterprise Partnership.

The aspirations of a local body formed to encourage business development is not an “exceptional circumstance”. Many towns and Councils now have similar

organizations. The Council still point to the advanced manufacturing sector to justify their proposed development policy, but still do not produce any evidence in support. There are other, larger employers in the manufacturing sector in Bridgnorth, and other sites earmarked for employment development in the town that have not yet been developed. The Housing and Employment Topic Paper drew attention to the fall-off in the recent past in the delivery of both housing and employment development in the town. This, then, is not an exceptional circumstance that applies to Stanmore, and is not a situation that is, in itself, holding back development at Stanmore or elsewhere in the town.

Again, there is nothing exceptional in this situation, and no evidence to support what the Council claim. Other commercial operators experience similar issues and make use of whatever is necessary in their own situation.

The Council again and again repeat their view that Stanmore is a “centre of excellence for engineering and advanced manufacturing” whereas it no longer fulfils that role. Even the operator that came along after the “Marches Centre for Manufacturing and Technology” vacated the site was essentially a waste recovery operation. That, too, has now disappeared to be replaced by a domestic fuel and pet food merchant, which again does not fit a description of advanced manufacturing.

In any event, the Council implies that they will be looking to encourage “advanced engineering” operations to locate at Stanmore. They do not, however, give any indication of how those uses might be identified or how they might be attracted to Stanmore. Precisely how the 11.5ha. at Stanmore is likely to be any more enticing for that type (though not defined) of industry than any other plot of land in the Bridgnorth area is not explained. Many Councils have operated Green Belt policy to place restrictions on residential and employment development over the past 50+ years; there is nothing unusual about that and allowing expansion of existing firms is not an exceptional circumstance whatever the type of business concerned.

It appears to the objectors that the Council has not looked in detail at the current situation at Stanmore, with Companies looking to survive more than expand. The Council do not appear to have any evidence of the need for expansion other than a conversation with the Estate’s Agent. They ought to have carried out a more in depth assessment given the implications for the Green Belt.

As matters stand the objectors do not believe that the Council has set out a fully justified case for removing land from the Green Belt, which might then, quite possibly, stand unused for many years.

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Paragraph(s):	Appendix 2
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Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

Shropshire Local Plan

Objection by Save Bridgnorth Greenbelt and Hobbins Management Co Ltd

Additional Sustainability Appraisal Report

“Save Bridgnorth Greenbelt” and the “Hobbins Management Co. Ltd.”, submitted representations at the time of the Regulation 19 consultation in May 2022. They objected to the proposals in the Plan as far as they related to extensions to the employment site at Stanmore.

The additional Information set out in the current consultation exercise based on updates of

- i. the Housing and Employment Topic Paper (GC45),
- ii. the Green Belt Topic Paper (GC46) and
- iii. the Additional Sustainability Appraisal Report (GC44),

provides nothing that would cause the two parties to withdraw or modify their objections to the Plan but, if anything, causes greater concern about the unnecessary and unjustified loss of Green Belt land at Stanmore.

The objections contained in this statement should be read in conjunction with those earlier submissions. The objections of the two parties remain as strong as ever. In essence, the objections relate to:

- a. The proposed allocation of Sites STC002 and p58a at Stanmore for employment purposes, when further land for employment uses is not needed at Stanmore.
- b. The removal of the land covered by Sites STC002 and p58a from the Green Belt without proper consideration of alternate sites and without exceptional circumstances that would justify the loss to the Green Belt being established.

The objectors consider that the proposal to allocate Sites STC002 and p58a at Stanmore and within the Green Belt for employment development will cause the Plan to be unsound because:

- i. The proposal is not consistent with national policy.
- ii. The proposal will not be effective because the outcome that the Council seek cannot be guaranteed to be delivered within the Plan period.
- iii. The proposal is not justified because it is not based on appropriate robust evidence and consideration of detailed alternatives.

They would like to see the two allocations deleted from the Plan and the land kept as open countryside and given the protection afforded by Green Belt status.

The Updated Sustainability Appraisal sets out a number of factors that have been taken into account when considering whether particular areas of land should or should not be developed.

As far as the proposed employment sites at Stanmore are concerned, in Table 2.2 following paragraph 12.76, the Council assesses the relative sustainability of various land parcels that were being considered for allocation. Site p58a and Site STC002 both receive a rating of “Fair” for their overall sustainability. There is clearly nothing special about these sites that would make them require special consideration in allocations. They are not particularly attractive sites from an operator’s point of view, and the extra travelling that will be necessary to work there might prove unacceptable for some.

Appendix 2 to the Updated Stage 2a: Employment Sustainability Appraisal Site Assessment, contains a spreadsheet that is used to operate a points-scoring system to assess sustainability.

Both sites score a minus assessment in terms of being within 480m of a primary school, a GP surgery, a leisure centre, an outdoor sports facility, amenity green space, an accessible natural green space, and being sited wholly or partly on Grade 1,2 or 3 agricultural land. Site STC002 scores a plus point for having a boundary within 480m of a public transport node, but p58a again registers a minus. Then both sites are awarded a plus point for being brownfield sites. This, of course, must be incorrect because neither site has been in non-agricultural use for around 60 years and p58a, in particular, has been farmed. Neither site is awarded a minus score for being situated in the Green Belt, and for that matter, the Green Belt does not feature as a consideration in terms of sustainability.

The scoring system is perhaps less than robust, but the end result is that both sites are regarded as having “fair” sustainability credentials. Neither achieves a “good” rating. This assessment has been carried out in relation to other sites, and some do achieve “good” ratings. It would seem sensible to discard sites that can only achieve “fair standard” from proposals for development such that better overall sustainability performance can be achieved.

The sites at Stanmore should be deleted from being development sites because they are unsustainably located in open countryside, away from services.