

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

**A0255**

\*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

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**A0514**

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## Shropshire Local Plan Review Examination

### Stage 1: Matters, Issues and Questions

#### Matter 3: Development Strategy

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#### Hearing Statement on behalf of *Save Bridgnorth Greenbelt*

Wednesday 6<sup>th</sup>/Thursday 7<sup>th</sup> July 2022

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#### Introduction

This Hearing Statement is the first of the following three statements prepared on behalf of Save Bridgnorth Green Belt and in response to the 'Stage 1 Matters Issues and Questions' raised by the Examiners:

- Matter 3 – Development Strategy
- Matter 4 – Housing and Employment Needs
- Matter 6 – Green Belt and Safeguarding Land.

This statement concentrates on issues relating to the "Development Strategy (Policies SP1 – SP15) adopted in the Draft Plan, in particular as they relate to the proposal in the Draft Plan to allocate additional land adjacent to the Stanmore Business Park for employment development.

The Draft Plan contains other policies that are relevant to the Save Bridgnorth Greenbelt (SBG) objection to the proposals at Stanmore, namely relating to Employment Land Needs (Policy SP2) and the Green Belt (Policy SP11) which are to be discussed in different sessions of Stage 1 of the Examination. SBG addresses those policies in its Matter 4 or Matter 6 statement as appropriate. However, there is a significant degree of overlap between the questions and issues in each of the three matters. The evidence in SPG's three statements comprise a complete and coherent objection to the proposed allocations at Stanmore, and the Examiners are asked to have regard to all three of SBG's statements in considering each of Matters, 3, 4 and 6.

#### Summary of the objection

In brief, the objection submitted in respect of the Regulation 19 consultation draft of the Plan Review and which remains the SBG's concerns are,

- i. In terms of the overall need in the County the amount of land that has been calculated as being appropriate for development in the County is excessive. The proposed Stanmore allocations are unnecessary.

- ii. At the local level, the proposed allocations at Stanmore are unnecessary, as the existing Stanmore Business Park is not operating to full capacity, and there is no evidence of excessive demand for those plots of land that exist on the site.
- iii. The proposed allocations are sited on land which is included in the West Midlands Green Belt, and no “exceptional circumstances” have been identified, evidenced or justified, which would indicate that the boundary of the Green Belt should be altered in order to allow the use of the land adjacent to the existing Stanmore Estate to be used for employment purposes.
- iv. The plan would not become unsound if the land identified at Stanmore should be deleted as allocated employment sites, and the overall strategy could remain unaffected.

### **Background**

The existing Stanmore Business Park, initially Stanmore Industrial Estate, came into being in the mid 1960's. It extends to around 18ha. It had been developed during World War II as an RAF training camp, but was closed after the War, and purchased by Hickman Properties in the early 1960's in line with the policy of Salop County Council, at the time, of making use of former military sites to encourage employment provision. There are a number of such sites in Shropshire, Atcham, Leaton, (Near Shrewsbury), Condoover, High Ercall, Rednal, Park Hall at Oswestry, Ditton Priors, to name but a few.

The area surrounding the Stanmore site was formally approved as part of the West Midlands Green Belt in 1975 (though it had been first-proposed in 1955). No alterations to the boundary of the Green Belt have taken place in the Bridgnorth area since it was formally adopted. The Stanmore Industrial Estate was excluded from the Green Belt. The areas of land now proposed for allocation for employment uses are included within the Green Belt. The Hobbins is a residential development of some 123 houses that were formerly RAF officers and NCO's family accommodation.

The Business Park, together with the adjacent Country Park (owned and operated by the County Council) and farmland, totalling some 210 ha was proposed by the landowners, Stanmore Properties, Apley Estate and John Davies Farms (collectively, the Stanmore Consortium) for development as a Garden Village that would accommodate up to 850 houses (initially, with possible extension up to 1,500) and up to 16 ha of “new employment land”, as well as open amenity space and community facilities. This proposal was included in Shropshire Council's early consultation drafts of the Local Plan Review, but was jettisoned when another, similar sized development was proposed on land to the west of Bridgnorth which lies outside the Green Belt, and was considered by the Council to be preferable.

Extensions to the existing Stanmore site were first proposed, presumably to provide jobs for the future residents of the now abandoned Stanmore Garden Village proposal. That justification no longer exists.

There have been numerous planning applications for development on the existing Stanmore Business Park site over the years. The more recent, from 1984 to the present day, extracted from the Council's record of planning applications, is included at Appendix A to this statement. Following on from the RAF vacating the site, use was made of the numerous buildings that existed on the site. It is apparent, from the list provided at Appendix A, that there have been a large number of extensions/repurposing of the existing buildings on the site, which had been largely, originally, Class B2 general industrial uses (Class iv in the 1963 Use Classes Order) and Class B8 Storage and distribution. It is also apparent that, in more recent times, permission for other uses, for instance Class D1 training facilities, several sui

generis uses, and some Class B3 – B7 special industrial uses, has been granted, usually at the expense of B2 uses.

### **Draft local Plan Review – Policies SP1-SP15**

In relation to Policy SP2, the Inspector's questions ask whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to housing and employment land. This hearing statement does not concern housing development, but is focused on employment land.

SBG do not consider that the proposed allocation at Stanmore have been properly justified and do not believe that the allocations are consistent with national policy.

It is intended, then, to detail this position in relation to the Inspectors question relating to the "balanced growth" approach and the proposed allocation of around 300 ha of land, in a separate statement in relation to Matter 4 of the examination programme.

Should the Inspectors determine that the issue should, more properly, be discussed at the Session of the examination relating to "Development Strategy" (i.e. Matter 3), SBG will be happy to be included in that discussion under Matter 3.

In relation to those questions raised by the Inspectors relating to Matter 3 *Save Bridgnorth Greenbelt* wish to make the following comments:

1. In relation to Policy SP2, overall, it is accepted that the Plan makes more than sufficient provision for future employment. Indeed, there is considerable flexibility built into the figures and it is highly unlikely, given past performance, that there would be any chance of land supply shortage.

However, Stanmore is not an urban situation, nor a Community Hub or Community Cluster. The Hobbins development does not constitute a settlement that needs to be provided with further employment opportunities. Stanmore is in open countryside. The existing employment estate is located in open countryside. The Stanmore allocations are not in line with Policy SP2 because that says that new development should respond positively to its setting, local needs and climate change and there is no evidence of the proposed allocations being considered against these criteria.

2. Moreover, the sites proposed for allocation at Stanmore are unsustainable in terms of adverse effect on living conditions for existing residents, are not easily accessed from Bridgnorth by public transport, foot or cycle and therefore are bound to result in additional private vehicles on the local road network and thus inconsistent with draft Policy SP6(1), (3), (7). The allocations at Stanmore are in conflict with other strategies in the Plan (Policy AP11 relating to the Green Belt, for instance) and there is no exceptional circumstance need for that amount of employment land to be allocated, and the allocations do not accord with the National Planning Policy Framework. The two sites at Stanmore -Sites STC002 and P58a - should be deleted.

SBG are not aware of any options that were considered before deciding on the sites at Stanmore, other than those considerations given to the expansion of Stanmore as part of the Garden Village proposal, which has now been dropped. There does not appear to be any

detailed explanation of the need for the Stanmore sites other than the owners of the existing employment site indicating that they would like more land.

3. In relation to Policy No's SP8 and SP9, the identification of Community Hubs and Clusters is an important element in the distribution of development across the County, and SBG do not have any adverse comments to make on the system. However, concentration of development into Hubs and Clusters does not, according to Policy SP2.6, prevent the provision of "appropriate rural employment and economic diversification" (of which there is no definition), being permitted outside the Hubs and Clusters. For the Hubs and Clusters system to work, and hopefully to make those settlements more sustainable, there needs to be effective control of development outside them – in the countryside. If there is not, employment developers can feel secure in proposing employment development anywhere in the rural area under the guise of being "rural employment" of "economic diversification" and thus prevent that development taking place in more sustainable Hubs and Clusters.

To avoid SP2(6) becoming a loop-hole for economic development within the countryside and to ensure that the policy complies with NPPF para 16(d) (which requires policies to be "clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"), the phrase "appropriate rural employment and economic diversification" should either be clearly defined, or at the very least, qualified with the word "*limited* appropriate ...".

4. Policy SP10 reflects the Council's desire to promote an "urban focused" development strategy, directing "the majority of new development" to the Strategic, Principal and Key Centres. Community Hubs and Clusters will be the focus for development in the rural area.

The Examiners are asked to note that Stanmore is located in a rural area where there is no evidenced need from local businesses or community for extra employment land, let alone 11.4 ha. The area is not well served by public transport, the development would not be sensitive to its surroundings, and the site is extremely difficult to access by foot or by cycle. The land proposed to be allocated is not previously developed land and is not well related to an existing settlement.

Further, should the site at Stanmore be allocated and eventually granted planning permission in the absence of identified need, it would be likely that the development would act as a disincentive for employment land to be provided in more sustainable locations within the built up, or at least within the adopted development boundary, of Bridgnorth.

5. Policy SP12 says that the Council will support enterprise, the diversification of the local economy (targeting growth in under-represented sectors) and, of course, increasing productivity. There is no objection to this as a general principle, but there are no measures in the policy that could be used to assess whether Policy SP12 was actually producing what the policy aims for.
6. Policy SP13 says that Shropshire will deliver around 300 ha of employment development between 2016 and 2038; and will protect established employment areas for employment uses. Employment uses are defined at Policy SR13.2.

For the reasons set out in SBG's Matter 4 (Housing and Employment Needs) Statement, SBG considers the overall level of employment land allocation to be excessive, and in particular, the proposed allocations at Stanmore to be unjustified and unnecessary.

7. Policy SP13.7 is of particular concern as this suggests that there may be circumstances where the change of use of allocated sites (but not necessarily developed) or land on established employment areas, to other, non-employment uses, could be supported subject to certain conditions. Evidence will be produced in the Employment Land Needs session that the existing employment site at Stanmore, despite now being established for over 20 years, has never been fully developed and has, in the recent past, been losing operators. If more land is allocated, but the present trend continues, a large area of existing and allocated land could be subject to proposals that would mean the land would cease to be employment generating uses, and could change to other uses, possibly residential. This possibility is of concern, because the change of use of the proposed allocated sites at Stanmore to non-employment use would not enjoy the protection of the green belt which it has at present. The Stanmore sites should not be allocated for employment use.

It is also noted that para 5.29 of the Employment Strategy Topic Paper of 15 February 2022 places the two sites proposed for allocation at Stanmore as "Category B" sites which "*may indicate a potential suitability for consideration as part of a future planned approach to the growth of a settlement*". This, coupled in Policy SP13.7, re-opens the possibility of establishing residential development at Stanmore, which the Council has rejected in favour of development at Tasley. Such a possibility would not have to meet the tests of 'special circumstances' necessary to release land from Green Belt designation as neither the existing employment sites nor the allocated sites would be subject to Green Belt restrictions. Again, the Stanmore sites should not be allocated for employment use.