

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:	Bridgnorth Aluminium
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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):	Please see document: Bridgnorth Aluminium – Housing and Employment Reps June 2024
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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 document: Bridgnorth Aluminium Housing and Employment Reps June 2024

(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

Updated Housing and Employment Topic Paper

June 2024

Document Identification	Detailed Comments
<ul style="list-style-type: none"> • Housing and Employment Topic Paper • Chapter 2 • Chapter 14 • Concerns over soundness 	<p>Our client, Bridgnorth Aluminium, operates a large industrial site at Bridgnorth. The business has operated in the town since the 1950s and is a major employer in its own right as well as supporting a substantial number of jobs locally and indirectly across the County, within the wider region in supply chain, maintenance and associated businesses. The business undertakes casting, rolling and finishing operations at the site and produces over 100,000 tonnes of flat rolled aluminium products per annum and is considering expanding that capacity in the coming years to cover additional opportunities.</p> <p>More than 90% of the products are exported to various customers in Europe, US, India and other global regions. Bridgnorth Aluminium is for certain products like lithographic coils for the printing industries one of the top market leaders. The business is serving into other key global markets like EV market, packaging sector, automotive, building and construction and other industries with further growing potential. The business also undertakes R&D operations from the site. Bridgnorth Aluminium is committed to its operation in the town, from which it draws a highly experienced workforce, including specialist and engineering roles. The business has approximately 350 employees at the site in addition to other roles supported as part of the supply chain both in Bridgnorth and elsewhere within the County. Indeed, the business is constantly considering opportunities to diversify and expand its operations in order to secure its future and grow within the town and be an economic driver for the wider county.</p> <p>The site is located to the south-east of Bridgnorth, to the east of the River Severn. Bounded to the west and north by the urban form of the town and to the south and east by the Green Belt.</p> <p>Our client notes the Council's proposal to pursue a high growth option 15% above identified baseline employment need and that this has been promoted separately to meeting the unmet needs of the Black Country. Our client strongly supports the Council's intention to allocate additional sites to meet the Black Country's unmet employment land need as to meet this need within existing allocation or through some form of densification exercise would pose a significant risk to the ability of existing employers within Shropshire to implement growth plans. The risk of additional competition for sites arising from 'overspill' from the Black Country will be mitigated by the allocation of two additional employment sites (SHF018b & SHF018d) in an appropriate location (Shifnal) is considered a logical and appropriate response to meeting the Black Country unmet need for employment land. However, this does not support established major employers in the area.</p>

The Housing and Employment Topic Paper (HETP) [GC45] sets out that the Council will be pursuing a high growth strategy which results in proposing an employment land need 15% over the identified baseline employment need. This, along with updated evidence, equates to a need to accommodate a 20Ha uplift in the employment land requirement in the plan.

The Council considered four options for meeting this uplift and has concluded that Option 1 'Utilising settlement guidelines and windfall allowances' for the identified employment land supply to be the most appropriate, following work in the updated Sustainability Appraisal. This is considered logical in theory, as it would allow existing business to expand. However, this approach will only support existing business where land is available to do so in an appropriate and viable location. This option is not practicable in instances where there is no land available for existing businesses to expand on to. It is not clear that the Council has investigated this option in sufficient depth to be certain that there is scope and capacity to deliver appropriate expansion options within the major employment generating settlements within Shropshire. This concern is set out in the context of our client's operations below.

Our client is understandably concerned about the soundness of this approach as it is an overly simplistic approach to the issues and fails to consider the realities of such a policy 'on the ground'. The nature of an industrial process, such as those undertaken by Bridgnorth Aluminium, requires a single, connected site. The implications of multiple sites introduce additional & unnecessary risks for a safety conscious business like Bridgnorth Aluminium. The movement of both their raw material and finished goods are kept to a minimum to safeguard their workforce and to align with their sustainability commitments. Operating over two or more sites creates a requirement for constant 'double handling' of products leading to a greater carbon footprint as well as significant cost burden to the business. This is particularly the case with industrial processes which deal with heavy products such as raw, scrap and finished metals.

As such, were Bridgnorth Aluminium to expand, it would be at and around its existing site. Expansion to the north and west is not possible due to existing development, including residential properties. Expansion options are therefore limited to the south and east of the site, which lie outside the settlement boundaries and within the Green Belt.

The Council consider there to be sufficient flexibility and allowances within the proposed Local Plan policies to allow businesses to meet the demand for employment land in the County. This may be true for employers located elsewhere, however, Bridgnorth Aluminium would be subject to national and local Green Belt policies should expansion be sought to the Bridgnorth site. This largely pushes the policy burden to

	<p>national planning policy in relation to demonstrating “Very Special Circumstances”. The Council includes support for the development of employment sites in the case of significant inward investment (Part 6g of SP13 ‘Delivering Sustainable Economic Growth and Enterprise’) however it is important that the Council clarify that such inward investment opportunities could contribute to a Very Special Circumstance case for employers such as Bridgnorth Aluminium.</p> <p>In the absence of the allocation of new employment sites to meet the uplift in employment land need, identified during the current exercise, the Council has the opportunity to make appropriate changes to the various policies which govern windfall employment development to ensure that the aims of following the preferred option are practicable and are able to deliver the modernisation and expansion of existing businesses, in order to protect their future in the County.</p> <p>The exercise undertaken by the Council offered an opportunity to review the Council’s approach to delivering employment land within the County to better match the Council’s economic growth aspirations. While substantial and specific provision has been made to accommodate the unmet need for employment land arising from the Black Country, this is in stark contrast to the provisions allowed for major existing employers with growth aspirations which are already successfully operation within the county. Policy S3.1. Development Strategy: Bridgnorth Principal Centre of the proposed plan sets out that 49Ha of land will be made available which ‘will make provision for the needs of the town and surrounding hinterland, including attracting inward investment and allowing existing businesses to expand’. As set out above, our client does not believe the work undertaken as part of this consultation or as part of the wider Local Plan preparation adequately supports the growth aspirations of existing businesses such as Bridgnorth Aluminium.</p> <p>Our client requests that consideration is given to adding specific allocations of employment land to support the growth of existing businesses including around the existing Bridgnorth Aluminium site and to consider amending the wording or relevant policies to allow sufficient scope for such businesses to expand operations at existing employment sites.</p>
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