

Shropshire Local Plan Review Examination

Stage 2: Matters, Issues and Questions

Matter 4: Employment Land Need and Supply

Hearing Statement on behalf of Save Bridgnorth Green Belt

Tuesday 22nd October 2024

1.0 Introduction

- 1.1 This Statement has been prepared in order to set out “Save Bridgnorth Green Belt’s” position with regard to the proposed allocation of Sites STC002 and P58a for employment development at Stanmore. “Save Bridgnorth Green Belt” represents a number of residents who live in the vicinity of the proposed development sites. A list of these residents has been submitted in earlier submissions in relation to the Draft Local Plan. Save Bridgnorth Green Belt objects to the allocation of Sites P58a and STC002 for employment development
- 1.2 The inspectors will recall that representations were made in respect of the proposed allocations at Regulation 19 stage of the Local Plan process and at the time of the Stage 1 Examination.
- 1.1 The **ISSUE** raised by the Inspectors in Matter 4 is:
- “Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of employment land..”*
- 1.3 Save Bridgnorth Green Belt’s essential concern is that the two sites proposed to be allocated for employment development at Stanmore are,
- i. Unnecessary as the other new employment allocations, saved allocations and existing unused employment land are more than sufficient to meet the needs of the town in the Plan period.

- ii. Located in open countryside and the Green Belt, and their allocations have not been justified by explaining a set of genuinely exceptional circumstances, in the Draft Local Plan.
- iii. Unjustified and likely to be ineffective in the Council stated aim of bringing advanced engineering to the town. The demand or need for the release of the land concerned has not been demonstrated.
- iv. Lacking any guarantee that the sites will be developed within the Local Plan's plan period.
- v. Going to significantly detract from the appearance, character and rural tranquillity of the area in which they are located, to the detriment of the amenities enjoyed by the nearby residents.

2.0 Background

- 2.1 The background to the proposed allocations is that, in the first draft version of the Local Plan Review, Shropshire Council proposed the construction of a new village at Stanmore for, initially 850 houses, but with the possibility of expansion to well over 1000. The existing Stanmore Business Park was central to the project. Save Bridgnorth Green Belt objected (along with many others) to this proposal.
- 2.2 In due course, a proposal was put forward by developers to create a new village at Tasley on the western side of Bridgnorth. The Council considered this as a better proposal than that involving Stanmore, and the Tasley proposal was adopted and is now part of the current examination. No further residential development was proposed at Stanmore.
- 2.3 At the time that the Stanmore new village was proposed in the Preferred Options Consultation, site P58a was indicated as being an extension to the Stanmore Business Park, but site STC002 was included within the major part of the site as 'mixed use', that is mainly residential with other uses as necessary. The new village was said to need 16ha. of new employment land and as P58a was a site extending to 6.8ha., the further 9.2ha. would have had to be delivered via the land shown as "mixed use" along with all the housing development.
- 2.4 At that time the SAMDev Plan (the plan period of which was 2006 – 2026) was the detailed element of the development plan, and showed the whole of the Stanmore Business Park (or Stanmore Industrial Estate as it was then) as being a "protected employment area" but no extensions to the employment provision were proposed. Land at Tasley (Sites ELR011a and ELR011b) was allocated for employment purposes in the SAMDev Plan and was intended to produce 13.3ha. (net of landscaping), whilst 2 sites (BRID001 and BRID020b) were shown as providing for the construction of (between them) 500 dwellings. The plan was to provide 140 dwellings and 13ha. of employment land over the plan period. Neither the housing nor the employment land has actually been developed.

- 2.5 The Preferred Sites Consultation of Novembers 2018 – January 2019 indicated that the Council proposed to plan for a population increase of 1500 dwellings and at least 16ha. of employment land in Bridgnorth. It also indicated that 12ha. of the 16ha was already committed and so only 4ha. of new land was required. However, the Council then indicated that an extra 12ha was needed because Bridgnorth had an urgent need for more employment land. No evidence was furnished to explain why an extra 12ha was needed, and no explanation was given as to why the employment land shown in the SAMDev Plan had not been developed.
- 2.6 The plan was summarised in the Consultation Draft to say that
- i. The preferred employment land guideline was 16ha.
 - ii. The additional provision to address local circumstances was 12ha.
 - iii. Land already Committed or Allocated at 31 March 2017, was 12ha.
 - iv. The employment land shortfall, then, was 16ha
 - v. Thus the amount of new employment land to be allocated was 16ha
- 2.7 In Bridgnorh itself sites ELR011a and ELR011b were shown as existing employment allocations, presumably for 13.3ha with a further small area of land off Worcester Road, presumably making up the allocation to 16ha.
- 2.8 When the proposal to develop the new village of Tasley became the favoured option, the plan indicated that some 16ha of land would be provided for employment purposes within that village development.
- 2.9 Policy S3.1 says that the Council intend to construct 1800 dwellings and provide 49ha. of land for employment purposes. Policy S3.1.5 says that the employment land will be provided by
- i. New allocations.
 - ii. Extensions to Stanmore Industrial Estate.
 - iii. Saved SAMDev allocations.
 - iv. Windfall developments.
- 2.10 There is no explanation of the need for 49ha of employment land in Bridgnorth, which is a significant uplift from the earlier versions of the Plan and the calculated employment land need.
- 2.11 The Preferred Options Consultation of 2017 confirms that Bridgnorth needed an additional 4ha. to meet the assessed need of 16ha.
- 2.12 The Regulation 19 Pre-submission Draft of the Local Plan shows at Appendix 6 that Bridgnorth completed only 0.4ha of employment land between 2016 and 2019, and had 1.3ha of land available in existing employment areas, 0.3ha available on a “committed sites” and 8.2ha on saved allocations. New allocations were calculated at 27.4ha, making a total of land that was to be made available in Bridgnorth for employment development of 37.7ha. A further approx. 3ha was to be made available in Community Hubs and Clusters.

3.0 Employment land Need and Provision

3.1 The Council's calculations of employment land need in Bridgnorth have always been difficult to follow but it appears that the Draft Plan indicates provision for,

- a) 16ha of employment land in the new village at Tasley.
- b) 13.3 ha in sites ELR011a and ELR011b allocated in the SAMDev.

and committed sites comprising,

a) Undeveloped land at Stanmore	2.8ha
b) Undeveloped land at Bridgnorth Aluminium	0.3ha
c) Undeveloped land at Faraday Drive	0.3ha
d) Undeveloped land at Chartrell Business Park	4.6ha
TOTAL	8.0ha

3.2 So, the total available land according to the Council's assessment is,

i. Land within the new village, Tasley	16.0ha
ii. Land already allocated in SAMDev	13.3ha
iii. Committed sites	<u>8.0 ha</u>
	37.3ha

3.3 The Council's overall development strategy as expressed in Policy SP2 is that, "over the plan period from 2016 to 2038, around 30,800 new dwellings and around 300 hectares of employment land will be delivered", and that "to achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas".

3.4 Then, in Policy SP2.6 the Plan says that "recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs.....and to a lesser extent in Community Clusters". Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.

3.5 The Council's target of 300ha. of employment land, is now to be increased to 320 in order for 30ha. of the overall figure to be provided to meet unmet needs of the Black Country Authorities. However, none of the proposed allocations at Bridgnorth are required to cater for the unmet need from the Black Country Authorities as the 30ha. to assist in that requirement has all been accommodated elsewhere in the County.

3.6 So, to make allocations for new housing and employment land in Bridgnorth comply with the overall strategy, the new allocations should be within the urban area of Bridgnorth, and should have a relationship with the overall number of new dwellings that are proposed.

3.7 Bridgnorth is a Principal Town in the hierarchy of settlements in the County and it might be reasonable to expect that , whilst housing figures will vary, there might be a similar

relationship between housing proposals and employment land proposals as other Principal Towns.

3.8 However, the proposed sites at Stanmore are not sited within the urban area, nor are they within established Community Hubs or Community Clusters. They are situated in “countryside” where it is the Council’s policy to restrict development unless, as far as employment land is concerned it involves “appropriate rural employment and economic diversification”.

3.9 The Council’s calculations of employment land need in Bridgnorth have always been difficult to follow but it appears that the Draft Plan indicates provision for,

- c) 16ha of employment land in the new village at Tasley.
- d) 13.3 ha in sites ELR011a and ELR011b allocated in the SAMDev.

and committed sites comprising,

e) Undeveloped land at Stanmore	2.8ha
f) Undeveloped land at Bridgnorth Aluminium	0.3ha
g) Undeveloped land at Faraday Drive	0.3ha
h) Undeveloped land at Chartrell Business Park	4.6ha
TOTAL	8.0ha

3.10 So, the total land available within the Bridgnorth development boundary, according to the Council’s assessment, is,

iv. Land within the new village, Tasley	16.0ha
v. Land already allocated in SAMDev	13.3ha
vi. Committed sites	<u>8.0 ha</u>
	37.3ha

3.11 The existing Stanmore Industrial Estate is not fully developed, and no special reasons have been advanced for increasing the overall employment target for Bridgnorth to 49ha. or why Bridgnorth should have such a high ratio of hectares of employment land to new housing development. It appears that the relationship is 1 ha. of employment land for every 36.7 new dwellings. The nearest other principal town to have a similar ration is Market Drayton at 1ha. per 41 dwellings. Shrewsbury, with the largest number of new homes to be provided has a ration of 1ha. per 77 dwellings.

3.12 Further, if the sites at Stanmore are allocated for development and IF the land requirement in Bridgnorth is indeed sufficient to justify someone developing them, it will mean that there will be no incentive for the other allocated or saved SAMDev sites to be developed.

4.0 Conclusion

4.1 The proposed allocations for employment development in Bridgnorth are not in accordance with the strategy set out in Policy SP2, and cannot, therefore, be considered to be sustainable, justified, effective, or in accord with national policy. The proposed employment sites, P58a and STC002 should be deleted from the Draft Plan.