

BRIDGNORTH TOWN COUNCIL



Shropshire Local Plan Examination Stage 2

Matter 26

Bridgnorth Town Council
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Hearing statements

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Matter 26 - All Employment Allocations	
Issue	Whether the proposed are justified, effective and consistent with national planning policy.
Matter 26 Employment allocations	
P58a – Land north of Stanmore Industrial Estate – see MM082	MM082 updates the usage classes and clarifies that sui generis service uses “that would improve the self-containment of the larger employment area” would be supported.
STC002 – Land adjacent to Hickman Road, Stanmore Industrial Estate – see MM083	MM083 updates the usage classes and clarifies that sui generis service uses “that would improve the self-containment of the larger employment area” would be supported.
BRD030 – Tasley Garden Village, Bridgnorth – see MM081	MM081 changes some detailed wording which may affect the employment use. A statement that “If it is not possible to provide sufficient on-site open space, including playing fields, appropriate off-site provision will be required. In accordance with Policy DP16, open space, including playing fields, will be managed and maintained in perpetuity by way of legal agreement” has been added. A requirement that “Any planning application will be accompanied by a heritage assessment, including an archaeological assessment where necessary” has been added. The condition relating to Poultry Units ceasing operation has been removed.



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Question 2 for all sites - *Bridgnorth Place Plan area general approach*

What is the scale and type/mix of uses proposed?

1. We note that the employment development guideline set out in S3.1.1 is “making available around 49Ha of employment land to create choice and competition in the market”. We understand from Table 15.1 of the updated Housing and Employment Topic Paper (April 2024) GC45 that this comprises 39Ha of urban land supply and 10Ha of windfall capability. Schedule A6 of the draft plan SD002 indicates a Strategic Land Supply of 37.7Ha. This comprises new allocations of 27.4Ha, saved allocations of 8.2Ha, and a further 2.1Ha (assumed to be available on existing sites). We are unsure of the provenance of the windfall capability of 10Ha quoted in GC45, nor how the difference between 37.7Ha Strategic Land Supply (Schedule A6 of SD002) and 39Ha Urban Land Supply (per Table 15.1 of GC45) arises.
2. We agree that the figure quoted in Schedule A6 for new allocations of 27.4Ha equates to the proposed allocations of P58a (6.8Ha), STC002 (4.6Ha) and the employment element of BRD030 (16Ha) referred to under S3.1.
3. “Saved allocations” per Schedule A6 are 8.2Ha. Para 5.59 of the main report refers to ELR011a (designated for the relocation of Bridgnorth Livestock market) as having a net developable area of 6.7Ha and ELR011b 6.6Ha. Given the restriction on use proposed for ELR011a and that it represents a replacement of employment land which is proposed to be redeveloped for housing (as part of BRID020) this does not represent land available for other new development. Under SAMDev there was an allocation of 1.5Ha of land at Old Worcester Road (W039) with a presumption in favour of use for recycling industries; this is not referred to in the text explaining policy S3.1. We would appreciate confirmation of whether this site remains available.
4. For the purposes of our further comments, we assume that “saved” allocations of 8.1 Ha (ELR011b and W039), together with the new allocations of 27.4Ha, are available to support economic growth. These total 35.5Ha. We recognise that in practice there is some capacity at existing employment sites, and that some job creation would take place within the new residential allocations (retail, care sector, etc.).



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5. We have attempted to assess whether the proposed settlement strategy/ residential guidelines for Bridgnorth would provide sufficient employees to enable the proposed allocations to be fully developed for employment purposes, using the methodology outlined in 17.9 to 17.46 of the updated Housing and employment topic paper GC45.

<i>Table – estimate of Bridgnorth workforce availability</i>		
	<i>Bridgnorth</i>	<i>Shropshire</i>
<i>Employment land to be developed Ha</i>	<i>35.5</i>	<i>320</i>
<i>Employment at 67.07 jobs per Ha</i>	<i><u>2,381</u></i>	<i><u>21,400</u></i>
<i>Existing homes (est)</i>	<i><u>6,000</u></i>	<i><u>150,000</u></i>
<i>Proposed residential development</i>	<i>1,800</i>	<i>31,300</i>
<i>Baseline growth in households (2014 SNPP) pro-rata</i>	<i>800</i>	<i>19,975</i>
<i>Additional household growth over baseline</i>	<i><u>1,000</u></i>	<i><u>11,325</u></i>
<i>Workforce growth associated with baseline housing growth (pro-rata)</i>	<i>80</i>	<i>1,979</i>
<i>Workforce growth associated with additional housing growth (0.94 labour per dwelling)</i>	<i><u>940</u></i>	<i><u>10,636</u></i>

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<i>Workforce growth associated with housing development</i>	<u>1,020</u>	<u>12,615</u>
<i>Prospective labour shortfall</i>	1,361	8,785
<i>Addressed by:</i>		
<i>Managing Unemployment and Economic Inactivity</i>	<i>Pro-rata to starting homes</i> 286	7,140
<i>Assumed in commuting to Shropshire associated with 30Ha contribution to Black Country employment land needs</i>	0	2,300
<i>Influence commuting with Black Country*</i>	715	2,335
<i>Commuting from Wales</i>	0	1,030
<i>Potential solutions to workforce shortfall</i>	1,001	12,805

*This is a blended assumption of doubling the rate of commuting from the Black Country into Shropshire 2,200 and halving commuting from Shropshire to the Black Country (said to be 4,615 per para 17.37 of GC45. The latest data available to us is from the Bridgnorth Market Town profile (EV073.3) and ultimately derives from the 2011 census. Page 27 of that document indicated 722 people commuting into Bridgnorth from Dudley, Sandwell and Wolverhampton and 1,419 commuting to Dudley, Sandwell, Walsall and Wolverhampton. Halving this would be 710.

6. The calculations in the Table above are inevitably crude and based on incomplete data, but illustrate that allocating a Town with 4% of Shropshire's existing housing, and 6% of its new housing but delivering up to 11% of its employment land would



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present a significant challenge in generating a sufficient workforce. Shropshire wide, the gap would be 41% of employees required, for Bridgnorth it would be 57%. In either case the suggested strategy for closing the gap requires action with the prospective workforce which may not achieve results and/ or increasing commuting overall. If only 75% of the employment land being made available in Bridgnorth were developed, the workforce required would reduce by just under 600. However, we have concerns over the level of housing development being assumed and if it were reduced by about 1/3rd this would also remove about 470 prospective workforce.

7. Paragraphs 16.90 to 16.92 of the updated Housing and Employment Topic paper GC45 highlight the disadvantages to allocating employment land to meet the Black Country's shortfall at Tasley and 16.99 extends this reasoning (essentially poor connectivity) to Stanmore. It is not clear to us why these should be drawbacks to meeting needs arising in the Black Country but are acceptable otherwise in an assumption that business will locate in Bridgnorth. Although start-up sites such as BRD030 and ELR011b offer an opportunity to create an attractive business environment they are, as yet, unproven.
8. In summary, we are concerned that the employment land allocation currently being considered for Bridgnorth is likely to be excessive for delivery during the plan period, particularly since the pace of development in the Bridgnorth area is required to be phased to take account of critical infrastructure delivery. Consideration could be given to reducing it by (say) 10Ha.
9. We are, however, aware of the concern expressed by Bridgnorth Aluminium Ltd (respondent A0310) in their representation on the updated Housing and Employment Topic Paper April 2024. We consider that support for existing established business is essential and would particularly ask that their request for clarification of what may constitute "Very Special Circumstances" is addressed.