



Matter 26 Response Bridgnorth Place Plan Area Employment Allocation

Worfield & Rudge Parish Council would like to refer to existing evidence concerning the soundness of S 3.1(i), S3.1(ii), and propose modification. We provide this in addition to previous submission statements.

MM081 BRD030

We consider that the proposal to allocate Sites BRD030 at Tasley, Stanmore STC002 and P58a for employment development will cause the Plan to be unsound because:

- I. The policy will not be effective because the outcome that the Council seek cannot be guaranteed to be delivered within the Plan period.
- II. The policy is not justified because it is not based on appropriate robust evidence.
- III. The policy does not support existing businesses within the place plan area.

MM082 and MM083 for STC002 and P58a:-

- I. The policy is not consistent with national policy.
- II. The policy is not justified because it is not based on appropriate robust evidence and consideration of detailed alternatives.

1. Background

Responding to the site allocations we consider the inter relation between jobs and homes.

Inspectors question: -

1) What is the background to the site allocation? How was it identified and which options were considered?

- 1.1. As set out in S3.1 it does not accurately describe what is currently proposed. Para 1 of the policy states “New housing and employment will make provision for the needs of the town and surrounding hinterland including attracting inward investment and allowing existing businesses to expand”. The plan is not providing provision for a key employer of the area[12].
- 1.2. Consideration of local allocation within the Bridgnorth Place plan area by virtue must have considered the wider Shropshire spatial strategy. Promoters question this strategy within their responses with some conflicting. This by virtue casts doubt regarding the soundness of the allocations and selection of sites within the Bridgnorth Place Plan area. Here a link between employment land, Jobs and homes is unavoidable. We question the sustainability of the approach. We also consider local businesses with aspiration to grow, not considered at the plan forming stage.
- 1.3. The land allocation to meet the unmet need for jobs is stated as Shifnal with no allocation of homes supporting the unmet need.
- 1.4. Bridgnorth has a housing unmet need allocation of 600 homes however no allocation to meet the unmet employment need. Employment unmet need is based in Shifnal. We question the sustainability of this approach, promoting commuting and unsustainable development.

- 1.5. We consider here the site promoters evidence set against the backdrop of Bridgnorth supporting the housing unmet need, and its allocation of employment land, here our focus is employment allocation.
- 1.6. Correspondence from promoters of sites in Shropshire, new evidence is presented supporting and justifying development. The site promoter & Taylor Wimpey for Albrighton [4], highlights key observations. Albrighton has a commuter train station and good local transport links to key road infrastructure. The promoter supports and provides justification for Albrighton as a better location for supporting the Black Country's unmet need, employment land and residential housing. Albrighton is stated as having a better link to the Black Country when compared to Ironbridge, Note Ironbridge is only 5 miles from the nearest train station and has development opportunities for a rail link. Ref [4] sections 3.18, 3.20,3.21, 3.23, 7.6 .
- 1.7. In contrast to Albrighton [4], Tasley promoter [3] & Taylor Wimpey evidence Tasley as being the best fit for meeting Residential Housing need for the Black Country's unmet need however state that Tasley does not represent an appropriate location to accommodate employment unmet need. The rationale is that Bridgnorth does not benefit from direct motorway access or rail access that businesses forced to relocate may consider important para 4.30.
- 1.8. Here it would seem we have promoters [3],[4], Taylor Wimpey with conflicting recommendations which together question viability and soundness of employment allocation in the Bridgnorth Place Plan Area. Evidence questioning employment provision in Tasley must also question provision in Stanmore by virtue of connectivity.
- 1.9. Bridgnorth Aluminium [12], a major employer, located centrally, engineering and advanced manufacturing, highlights constraints in expansion and requested provision of allocated land. It is not evident that the major employer has been considered within the plan forming stage. One would speculate that new more efficient lower energy smelting facilities encompassing energy recycling in addition to new rolling lines would be required, at least 2ha to 7ha requirement.
- 1.10. Deliverability, with little evidence of employment land being delivered over the SAMDev period both within Tasley and Stanmore 1.33,1.34,1.35. The basis seems questionable.
- 1.11. Concerns were raised regarding infrastructure provision and the capacity within the Bridgnorth area. The Bridgnorth Development Options Assessment (EV13) was carried out after Regulation 19 consultation and section 6.4 of appendix 1 identifies that highway junction improvements are needed. This does not feature within GC54, The highway assessment presumably did not take into account the journeys associated with development in Tasley being orientated towards the Black Country's needs and so does not fit the current development proposal for the area. Further we see no sign of improvements which may be needed in the area. No cost infrastructure plan is available for review nor funding route visible for comment. This questions viability.



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Inspectors question, Matter 4:-

3) Should the employment land requirement be also expressed in terms of the number of jobs expected to be provided?

- 1.12. We agree with this question and support employment land within the Bridgnorth Place Plan area being expressed in terms of number of jobs but also expressed in terms of housing provision in the locality of the jobs. This by virtue provides for sustainable development. We question the strategy being proposed in terms of sustainability.
- 1.13. Review of GC44 [9] and GC45[10] states the allocation to meet the Unmet need is 30ha equating to 2140 homes and 2012 jobs. The allocation of homes is however 1500. A disparity of 640 homes.
- 1.14. Linking jobs to homes at Tasley, 16ha is equivalent to 1073 jobs equivalent to 1141 homes.
- 1.15. The allocation at Stanmore is 11.5ha STC002 and P58a equivalent to circa 770 jobs.
- 1.16. The Bridgnorth place plan area 27.1ha an equivalent 1817 jobs equivalent to 1933 homes, this does not include SAMDev saved allocations.
- 1.17. Significant disparity exists between jobs and homes when considering new allocations. Allocated homes 1050 compared to 1933. An employment land conversion disparity of 883 homes, not considering SAMDev allocations.
- 1.18. This disparity seems to indicate the Council will be supporting unsustainable development within the Bridgnorth Place plan area with the policy as it stands.

Inspectors question: -

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

- 1.19. P58a and STC002- MM082, MM083 states sui generis. The exceptional circumstance sighted is Engineering and Advanced manufacture for release of the greenbelt. We question the deliverability of the Exceptional Circumstance against the proposed class usages.
- 1.20. As a material consideration in the planning stages of development, [6], [11] Noise and pollution complaints from residents should be conscientiously considered in terms of site suitability for future growth and class usage, we express concern that current policy and process may have failed to inhibit increasing noise and pollution creating harm if complaints are supportable. Consideration of B2 designation is required as well as review of DP18.



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3) What is the basis for this and is it justified?

Place plan area evidence [12]

- 1.21. Bridgnorth Aluminium [12], engineering and advanced manufacturing, states that it is restricted in direction of future development to the Greenbelt, they state "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".
- 1.22. Arguably the Council should support Bridgnorth Aluminium expansion aspirations and inward investment, Greenbelt policy may not be a barrier to growth.
- 1.23. No allocation has been proposed for such a major employer of the place plan area. One would speculate that new more efficient lower energy smelting facilities encompassing energy recycling in addition to new rolling line would be required, 2ha to 7ha requirement.

P58a and STC002- MM082, MM083.

- 1.24. SBGB & Hobbins [11] correctly question the justification for Exceptional Circumstance for removal of land from the Greenbelt. Evidence of the community view agreeing with Worfield & Rudge Parish Council [6], that change to Greenbelt Policy would be needed.
- 1.25. Referencing ID 28 Para 29 to 31. Para 30 references the Greenbelt for RAF Cosford not being a barrier in bringing forward development. Within Shropshire this is evidence that the Greenbelt is not a barrier to development.
- 1.26. Similarly there is an extant planning application for Stanmore STC002, 24/02781/FUL, under review and if approved with all material considerations addressed may demonstrate that Greenbelt is not a barrier to development. This would infer that the applicant believes that policy is not a barrier to development if exceptional circumstances truly exist.
- 1.27. It would therefore follow that P58a could be treated similarly.
- 1.28. ID 28 Para 31, Similarly, referring to the Inspector's wisdom, it may be that the council may find it hard to control future growth and meet the aspiration of excellence in advanced manufacture and engineering when non-Greenbelt Policy would be applicable. It may also be difficult to avoid repurpose of surplus to demand allocation.



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- 1.29. As noted in [11] numerous uses are occurring on the Stanmore site that don't meet the exceptional circumstance of Engineering and Advanced manufacture, future growth of these occupants needs further consideration. Policy must not be a barrier to growth.
- 1.30. Considering Bridgnorth Aluminium's aspiration for growth in the Greenbelt, if not a barrier then consistency in approach is needed.
- 1.31. We request the Inspector consider the decision regarding RAF Cosford to be applicable to the Bridgnorth Plan area.

Tasley BRD030 MM081

- 1.32. With the lack of evidence in delivery, implying potential lack of viability as employment units during the SAMDev plan period. The draft Local Plan guideline seems excessive and poses a risk of repurposing if deemed surplus to requirement. The danger here being Greenbelt land being used prior to Greenfield the latter being repurposed.

4) What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?

- 1.33. Stanmore applications focussing on new unit development, 24/02781/FUL 1 unit development pending STC002, 24/00555/FUL 5 unit development granted not constructed SAMDEV, 23/01680/FUL 1 unit development granted and completed 0.09ha SAMDEV, 21/03808/FUL 10 unit development granted not constructed SAMDEV.
- 1.34. Tasley applications focussing on new unit development. Evidence of none within the SAMDEV plan period.
- 1.35. Bridgnorth Place plan area, generally significant quantities of land still exist with lack of construction.

6) What are the potential adverse impacts of developing the site? How could they be mitigated?

- 1.36. Resident complaint if supportable, noise and airborne pollution, would indicate potential failure in current policy and may question soundness of proposed policy DP18. If failure in current policy is determined, mitigation or change in policy or procedure is requested in order that policy and procedure prevent harm being caused to Residents and Environment within Shropshire as a whole.
- 1.37. Stanmore, applications 22/01264/FUL, 24/02781/FUL we request review of Noise reports related to the current site and in addition STC002. Focus should be drawn to nearest receptor locations in 22/01264/FUL and Lamax,F readings unattended, noting exceedance of 60db for 124 occurrences over circa 3 days, 15 minute time duration measurement, 19 occurred during a sleep period with one measurement exceeding 80db. The risk profile of the site should be reviewed and considered in terms of suitability.



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- 1.38. Focus should then be drawn to cross comparison of noise assessment reports 22/01264/FUL, 24/02781/FUL and nearest receptor location.
- 1.39. 24/02781/FUL STC002, Biodiversity Net Gain Report, highlights net BNG loss supporting previous submission statements with regard to Biodiversity loss. From GC54 it is unclear how BNG loss will be reflected in S106 and applied locally to the site enhancing activities.
- 1.40. Tasley BRD030 [5] consideration in terms of additional contamination and harm should be given to point 5.9 the two SSSI's and 5.10 Heritage assets.

8) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- 1.41. GC54 doesn't clearly demonstrate that major arterial route improvements for the Bridgnorth Place plan area will occur. For clarity the A454 Wolverhampton to Bridgnorth, A442 Bridgnorth to Telford and Kidderminster do not seem to be proposed for strategic major improvements.
- 1.42. GC54 presents local and strategic road network improvements to facilitate development of BRD030 A458. To be informed by Highway transport Assessment and air Quality Assessment. No updated evidence of viability is available for review.
- 1.43. GC54 presents necessary improvements to the road network to facilitate development of P58a and STC002, no clarity is provided.
- 1.44. No detailed definition of what improvements may be required including associated costs, deliverability and viability and accessibility of key sites. Our understanding is that LTP3 covers the period 2011 to 2026, and that LPT4 has been in preparation for some time. It may be helpful to consider whether there is sufficient evidence that Shropshire wide transport requirements needed to support delivery of the draft Local Plan have been identified and can be confidently assumed to be deliverable.
- 1.45. Statements [5],[6], [7] all conclude that infrastructure improvements are needed locally to make the plan deliverable.

9) Is the site realistically viable and deliverable?

- 1.46. Referring to 1.33,1.34,1.35, with evidence of lack of planning application, completion and construction it is not evident that the Draft Local Plan would be deliverable, land has the potential of being surplus to requirement and repurposed.
- 1.47. The Draft Local Plan guideline seems excessive.

Inspectors question: -

11) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 1.48. STC002 pre-clearance, had unrestricted access for wildlife however this has now become restricted by erection of industrial fencing, restricting the natural migration corridors between the woodlands. This does not positively respond to the site's relationship.



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- 1.49. Adjustment of the boundary, leaving the allocations within the Greenbelt, STC002 and p58a will aid biodiversity protection by affording the protection that Greenbelt policy provides.

12) Are the detailed policy requirements effective, justified and consistent with national policy?

- 1.50. As set out in S3.1 it does not accurately describe what is currently proposed. Para 1 of the policy states “New housing and employment will make provision for the needs of the town and surrounding hinterland including attracting inward investment and allowing existing businesses to expand”. The Draft Local Plan is not providing provision for a key employer of the town [12] and restricts development to the key sectors of Advanced manufacture and engineering and complementary activities, we question the effectiveness of the policy in supporting existing businesses.
- 1.51. MM082 and MM083 states “..uses will be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing ...” It’s unclear how existing businesses not related to this sector can complement each other, they aren’t exactly “cream and strawberries”. This statement does not meet the needs of the place plan area and existing businesses.
- 1.52. The evidence base has not been corrected GC46 8.26 note 4. The statement is false, the pyrolysis plant tenant, Circular Resources Ltd, vacated the site, the site was stripped and converted to a warehouse containing domestic fuels and pet food. The evidence base is therefore not sound and not robust.
- 1.53. The statement MM083 STC002 “Any lost trees should be offset within the sites buffer” isn’t deliverable since the site was clear felled prior to habitat assessment and assessment of the number of trees present. This makes the policy unsound. We recommend review of the investigation for illegal felling lead by Defra and the Forestry commission and change of text to reflect those recommendations made by Defra and The Forestry Commission for restocking of the site be referenced in the policy.

2. Summary and Conclusions

- 2.1. Bridgnorth’s Place plan area plan would seem to promote an unsustainable pattern of development and not lead to effective implementation of homes or employment and public transport provision.
- 2.2. Given the link between homes and employment, this questions the housing allocation in Bridgnorth for meeting the unmet needs of the Black Country and must infer that the employment allocation of 27.1ha is not appropriate and not justified, the significant disparity, promotes unsustainable development.
- 2.3. There is now an extant planning application for part of STC002 24/02781/FUL which may demonstrate that the Greenbelt policy is not a barrier to development, it may be that development control is better suited to STC002 and P58a remaining in the Greenbelt. The applicant would seem to be happy with the submission. A consistent approach for the Place Plan Area is needed.
- 2.4. Adjustment of the boundary, leaving the allocations within the Greenbelt, will aid biodiversity protection by affording the protection of policy.



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2.5. Consideration of Bridgnorth Aluminium's [12] aspiration is needed, policy consistency is needed.

2.6. We unanimously object to STC002 and p58a being removed from the Greenbelt and BRD030 16ha being allocated.

3. Recommendations

3.1. We recommend that STC002 and P58a remain in the Greenbelt.

3.2. We recommend reduction of the employment allocation for Plan area by 10ha with an allocation considered for Bridgnorth Aluminium.

3.3. We recommend clarification of Greenbelt Policy within the Plan area accounting for Bridgnorth Aluminium's future aspiration, consistency of approach is needed.

4. References

[1] GC44 Updated Local Plan Sustainability Assessment

[2] ID 28 Para 30

[3] A070 Bloor Homes Tasley

[4] A011 Albrighton

[5] A278 Tasley parish Council

[6] A296 Worfield and Rudge Parish Council

[7] A120 Bridgnorth Town Council

[8] A270 Stanmore Consortium

[9] GC44 Additional Sustainability Appraisal Report,

[10] GC45 Updated Housing and Employment Topic paper

[11] A085 Save Bridgnorth Green belt / Hobbins Management Co

[12] A301 Bridgnorth Aluminium

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