

Shropshire Local Plan Review Examination

Stage 2: Matters, Issues and Questions

Matter 26: Employment Allocations

Hearing Statement on behalf of Save Bridgnorth Green Belt

Tuesday 3 December 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. In particular the Inspectors will recall that the objection to the allocation of Sites P58a and STC002 were the subject of comment at the Stage 1 Examination because of their location within the Green Belt.
- 1.1 The **ISSUE** raised by the Inspectors in Matter 2 is:

“Whether the Development Strategy is justified, effective and consistent with national policy.”
- 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 The Green Belt

3.1 Policy SP11.3 in the Draft Local Plan indicates that,

“The Green Belt will be protected against inappropriate development, as defined by national policy. As such in addition to meeting the general requirements that apply in the countryside as set out in Policy SP10, development proposed in the Green Belt must also be able to demonstrate that:

- a. It is not inappropriate development (as set out by national policy) and does not otherwise conflict with the purposes of the Green Belt; or
- b. Very special circumstances apply.”

3.2 The National Planning Policy Framework says at paragraph 137 that,

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

3.3 Sites P58a and STC002 are both located in the Green Belt. The Council have indicated that the form of employment development they feel should take place on the sites should fall within Use Classes B2, B8 and E(g)(i), (ii), and (iii), as well as suitable sui generis uses and others service uses that would maintain the cohesion of the Estate. This gives the developer a virtually free hand to site any form of employment use on the sites. Lots of employment uses would not be appropriate if situated on a site surrounded by Green Belt – they would for that matter, be inappropriate in a rural situation (countryside) in any event.

3.4 The Draft Plan does not explain why the particular areas of land have been chosen, why the size of those sites has been considered to be correct, or why such development cannot be sited on other allocated sites that are not within the Green Belt.

3.5 The Council have also indicated that they would be targeting the engineering and advanced manufacturing sectors for occupation of the sites in order to complement the existing employment offer at Stanmore. Engineering and advanced manufacturing are not a specific use class – they will be regraded as Class B uses. The usual permitted development rights would apply. The Plan does not supply any information that would justify the desire to locate engineering and advanced manufacturing on the site or give any indication of the manner in which the Council would ‘target’ that form of usage. The evidence on the ground is that the Industrial Estate is actually losing this type of operator rather than providing special facilities for it.

3.6 Policy SP11.3 is a policy which should be used when considering proposals for development in the Green Belt. In such circumstance it is necessary to consider any ‘very special circumstance’ that a proposal might enjoy. Policy SP11.1, however, simply indicates that the Council intends to extend the boundary of the Green Belt at Stanmore to accommodate the extension of the Industrial Estate, without any attendant justification. The Green Belt Topic Paper has to be referred to in order to find the

exceptional circumstances which the Council believes justifies the withdrawal of Green Belt status from Sites P58a and STC002. Simply, none of the matters which the Council have listed in the Topic Paper constitute 'exceptional circumstances.' They are, in large measure, issues that any Industrial Estate operator might wish for his land and are for the benefit of the landowner, not the sustainability of a rural community.

- 3.7 Should the land NOT be taken out of the Green Belt as proposed in the Draft Plan it would still be open to the Estate owner to come forward with individual development proposals which would then be assessed on the basis of Policy SP11.3 and whatever 'very special circumstances that were claimed could be examined. All that the proposed re-designation of the Green Belt land as an industrial site means is that the Estate operator can simply side- step having to demonstrate very special circumstances whenever he wishes to develop further.

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 Policy SP11. As such, the allocations cannot 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.