

Hearing Statement for the Shropshire Council Local Plan Examination

Matter 26 – All Employment Allocations

Statement on Behalf of the Stanmore Consortium Ref: A0497

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor Unique Part A Ref:	A0497
Matter	26
Relevant Question No.s	1, 2, 3, 4, 5

Stage II - Hearing Statement

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1. Introduction

- 1.1. This Hearing Statement is on behalf of The Stanmore Consortium (“TSC”) (Apley Estate and Stanmore Properties) and should be read in conjunction with previous representations made on behalf of TSC at the Regulation 18 and 19 Stages, the representations at the Stage 1 Examination Hearings and the updated Topic Papers in April 2024.
- 1.2. As background, Shropshire Council approached TSC in 2017 with a view to delivering proposals for a Garden Community for the future housing and employment needs of Bridgnorth on land owned by TSC.
- 1.3. In November 2018 the Shropshire Local Plan Review: Consultation on Preferred Sites was published with a masterplan mixed use garden settlement at Stanmore, initiated by the Council, as a Preferred Site. This followed extensive discussion between the Council and TSC, public consultation and provision of detailed information requested by the Council.
- 1.4. In April 2020 the Council abruptly changed its position on the Stanmore Garden Community proposal to an alternative on land west of Bridgnorth, not previously promoted nor consulted upon. This alternative was included in the Regulation 18 and 19 Stages of the Local Plan.
- 1.5. TSC continue to promote Stanmore Garden Community as the best option for Bridgnorth and Shropshire.
- 1.6. This Hearing Statement focusses on those specific questions which are directly relevant to TSC’s position.

2. Matter 26 – All Employment Allocations

Employment allocations:

P58a
BRD030

Question 1

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

- 2.1. In considering the Tasley Garden Village allocation (BRD030) and Land North of Stanmore Industrial Estate allocation (P58a), it is important to recognise the background to the proposed approach to employment allocations in Bridgnorth taken on the Local Plan.
- 2.2. In October 2015 the Inspector considering the Site Allocations Plan “SAMDev” stated that the eastern side of Bridgnorth is tightly constrained by the Green Belt, which she considered limits the growth potential of settlements in east Shropshire. The Inspector acknowledged that there were limited opportunities for new development outwith the Green Belt including to the west of Bridgnorth and recommended a modification to the SAMDev which introduced a commitment to a detailed Green Belt review as part of an early review of the Local Plan.
- 2.3. Shropshire Council were instrumental in identifying and approaching TSC in respect of their land holding at Stanmore, which includes the area immediately to the east of Bridgnorth with a view to delivering proposals for a garden community to meet the housing and employment needs of the Bridgnorth area. The Council brought key parties together to introduce the concept to be promoted through the Local Plan Review.
- 2.4. It was against the context of the Inspector’s comments on the SAMDev that the Council considered that the Stanmore site should be the location for a garden community focusing on the existing built development and recreational use. The Council through the earlier stages of the Local Plan Review supported the development of the Consortium’s proposals at Stanmore; this evolved through:-
 - 2.5. Issues and Strategic Options Consultation - early 2017
 - Preferred Scale and Distribution of Development Consultation (late 2017); and
 - Preferred Sites (late 2018/early 2019).
 - 2.6. Proposals for the Stanmore site were developed during 2018 when it became clear that two of the landowners, Apley Estate and Stanmore Properties, shared a vision to provide a new garden settlement at Stanmore. The concept and precise location of a garden community therefore evolved in consultation with the Council, using a combination of available landownership, with the most suitable areas of land for development.

- 2.7. Throughout 2018 regular meetings were held, led by the Council. In November 2018 the Shropshire Local Plan Review: Consultation on Preferred Sites was published with a masterplanned, mixed use, garden settlement at Stanmore as a Preferred Site.
- 2.8. The Consortium proposals were worked up and were presented in “A Vision for Stanmore Garden Community” March 2020. The proposal was designed using Garden Village principles, the first part of which would be commenced in the next five years and be completed by 2038.
- 2.9. Beyond the Local Plan period of 2038, land was to be safeguarded to allow the proposed Garden Community to expand to a total of 1,500 new homes and a further 14ha of employment land.
- 2.10. In April 2020, Shropshire Council unexpectedly and fundamentally changed its position on the Stanmore Garden Community proposal. The Council’s Local Plan’s Team sought to support an alternative proposal on land which had not previously been promoted through the Local Plan process and which was outside of the Green Belt. The Officers considered that the alternative proposal, Tasley Garden Village, promoted at that time by Taylor Wimpey, was able to offer a comparable garden village but outside of the defined Green Belt.
- 2.11. There has been no negative change in circumstances in terms of harm to the Green Belt since the Council made a draft allocation and in fact, the reduction in land area proposed by the Consortium at Regulation 18 stage in September 2020, reduces the level of harm from the position the Council were happy to support.
- 2.12. It is against this background that there remains a strong planning case to justify the development of a Garden Community at Stanmore and its inclusion in the Local Plan. As part of this planning case there exist exceptional circumstances to justify removal of the site from the green belt. By contrast whilst the land at Tasley is out of the green belt it is neither suitable, deliverable nor available; it is on this basis the Site Allocation Tasley Garden Village, Bridgnorth (BRD030) is unsound.

Question 2

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

BRD030

- 2.13. Policy S3.1(i) Mixed Use Allocations: Bridgnorth Principal Centre, requires a **comprehensive** mixed-use sustainable development which complies with the principles of a ‘Garden Village’ identified within the Garden Communities Prospectus, and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth’s character.
- 2.14. The Policy sets out the requirement which include:
 - 1,050 dwellings
 - 16ha employment land

- New local centre
 - 20ha of green infrastructure and
 - 19ha linear park
- 2.15. Policy S3.1(i) also requires that the development of this site should be undertaken in accordance with a vision, design code and masterplan which will be prepared in consultation with the public and adopted as a Supplementary Planning Document (SPD) by Shropshire Council. It also recognises that the SPD will represent a significant material planning consideration and **must** be completed before any planning application for development of the site.
- 2.16. Employment provision is recognised in the Policy as representing an important element of the development, occurring alongside and cross-subsidised by the provision of housing. employment land to be located in a gateway location on the site and of a high-quality design and layout. It should provide an opportunity for freehold employment land targeted towards office and research and development uses; complementing the wider employment opportunities in Bridgnorth and contribute towards the objectives of the Shropshire Economic Growth Strategy.
- 2.17. As required by the Policy the development is required to be brought forward through Garden Village principles. The TCPA guidelines state that a Garden Village should be a holistically planned new settlement, enhancing the natural environment, and offering high-quality affordable housing and locally accessible work in beautiful, healthy, and sociable communities.
- 2.18. The Statement of Common Ground between the Council and Bloor Homes and Taylor Wimpey (SoCG 13) makes it clear that proposals for the Tasley Garden Village are still being considered, with the site boundary changing and access still being developed. This clearly demonstrates that there are issues with land ownership, access and therefore deliverability.
- 2.19. Representations submitted by TSC at the Regulation 18 & 19 stages of the original proposals for the Tasley site highlight TSC's concerns regarding the ability of the proposed development to provide a wide range of local jobs within easy commuting distance of homes.

Statement of Common Ground SoCG13 Tasley

- 2.20. A review of the SoCG13 between the Council and Bloor Homes/Taylor Wimpey for the Tasley site raise a number of fundamental issues, which are set out below.

Site Boundary & Land Ownership

- 2.21. The Statement of Common Ground between the Council and Bloor Homes and Taylor Wimpey (SoCG 13) makes it clear that proposals for the Garden Village are still being considered and the site boundary is to be changed; which clearly demonstrates that there are issues with land ownership, access and therefore deliverability.

- 2.22. The proposal at Tasley relates to land in multiple ownerships, none of which are the promoters and all of which require formal legal arrangements, including an option and equalisation agreement, to be agreed with the owners if the site is to be delivered. There is neither proof of evidence of land ownership, nor has any equalisation agreements been declared by the promoters.

Illustrative Masterplan

- 2.23. The SoCG13 makes it clear that masterplan for the site is being reconsidered and will be the subject of public consultation before the Hearings. Given the advanced stage of the Local Plan, it is extraordinary that there are still discussions taking place and uncertainty over the red line boundary of the site; this clearly indicates that there are still issues with land ownership, which will result in delays in implementation of the site and the delivery of the objectives of the Policy.
- 2.24. Given the public consultation is still yet to take place and there is uncertainty with the site boundary & location of the proposed employment; there are clearly issues with land ownership, access and as a consequence there must be issues of deliverability.

Access and Highways

- 2.25. Whilst there is no masterplan to demonstrate how the access will be dealt with, it is important to understand the requirements of the policy and potential issues.
- 2.26. There is uncertainty over the means of access to the proposed site, which we understand will be the subject to further consultation; this clearly demonstrates the issues over the deliverability of the site. SoCG13 states “*it is agreed that safe access can be provided into the site, including access off the A458, in a way that is complimentary to the approved access to the SAMDEV allocations BRID001/BRID020b, BRID020a, ELR011/a & ELR011b*” Such an arrangement would involve taking access through land which is not in their control. We are aware that there have been no discussions with this landowner, which supports the view that there are serious concerns with the deliverability of the site.

Employment Land

- 2.27. There is a lack of evidence presented by the promoters of the Tasley site to justify the provision of further employment land in this location. TSC has serious concerns about the likelihood of the employment development on land to the west of Bridgnorth being delivered successfully, without significant support from the residential development.
- 2.28. The SoCG13 states that the employment land should be sited in a gateway location along the A458. Given the uncertainty over the access off the A458 and the lack of frontage it is difficult to see how a gateway employment site can be created. The SoCG identifies the possibility of accessing the employment through the SAMDev allocations; such an arrangement would involve taking access through land which is not in the control of the promoters, for which there is no agreement in place.

- 2.29. No evidence has been presented by the promoters of the Tasley site or the Council to show how the employment, (an important element of the Site Allocation BRD030 and a key part of the Garden Village principles) would be delivered. Without a clear demonstration as to how it can be viably delivered, the proposal cannot be justified or demonstrated to be deliverable and therefore is unsound.
- 2.30. The SoCG13 also fails to recognise and take into consideration the need to relocate the Livestock market; this will impact on the phasing, delivery, and viability of the proposed development.

P58a

- 2.31. Policy S3(ii) Mixed Use Allocations: Bridgnorth Principal Centre requires development at the site to be within primary use classes B2, B8 and appropriate sui generis uses; targeted towards the engineering and advanced manufacturing sectors to complement the existing Stanmore Business Park.
- 2.32. Highways improvements, effective boundary treatments, sustainable drainage and green infrastructure will be required at the site, along with appropriate design, layout and materials to mitigate any potential noise arising from the site.

Question 3

What is the basis for this and is it justified?

BRD030

- 2.33. TSC's response to Q2 above demonstrates that there are issues and uncertainties with the Tasley proposal, including land ownership, the site boundary and the delivery of the vehicular/pedestrian access. On this basis it is considered that there is no evidence to demonstrate that the proposed development is deliverable and can satisfy the challenges of Policy BRD030.

P58a

- 2.34. The requirements for P58a are set out in the development guideline of Policy S3(ii), this is supported by the HETP (GC45), which sets out the justification and exceptional circumstances for the release of the site from the green belt; this includes:
- 2.35. Supporting the role of Stanmore Business Park;
- 2.36. Supporting the medium and long-term needs of existing businesses on Stanmore Business Park;
- 2.37. Attracting new businesses, particularly those in the '*engineering and advanced manufacturing*' sector;
- 2.38. Supporting the strategic role of Bridgnorth;

- 2.39. Supporting the aspirations of the economic growth strategy for Shropshire and the Marches Local Enterprise Partnership (LEP);
- 2.40. It is also relevant to take into consideration the high occupancy rates at the Business Park, and the limited available expansion land necessary to support the medium and long term needs of the site occupiers, and for new businesses coming into the area.
- 2.41. The opportunity to deliver space to attract new business, particularly those in the ‘*engineering and advanced manufacturing*’ sector is encouraged in order to support the strategic role of Bridgnorth, by enhancing employment opportunities which will contribute to the achievement of the proposed settlement strategy for Bridgnorth.

Question 4

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

P58a

- 2.42. There are no relevant permissions applicable to this site.

Question 5

What are the benefits that the proposed development would bring?

BRD030

- 2.43. As stated above we have concerns that the proposals for the Tasley Site will not be able to deliver the benefits which should arise from the Garden Village particularly in terms of quality of design, community engagement, stewardship, infrastructure and importantly the delivery of the required employment. This is particularly relevant given the site location to the west of Bridgnorth and the lack of future demand for employment.

P58a

- 2.44. The release of Site P58a from the green belt to meet employment land needs in Shropshire would be beneficial to the existing Stanmore Business Park, together with supporting the strategic aims for Bridgnorth and the wider County. There are already high occupancy rates at the Business Park, meaning limited expansion land for any further development. Therefore, an expansion site is necessary to support the medium and long term needs of the site occupiers and for new businesses coming into the area.
- 2.45. Creating a space to attract new business, particularly those in the ‘*engineering and advanced manufacturing*’ sector will support the strategic role of Bridgnorth by enhancing employment opportunities contributing to the achievement of the proposed settlement strategy for Bridgnorth and the wider spatial strategy for Shropshire.

Question 6

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

BRD030

- 2.46. TSC have a number of key concerns about the impact of developing the Tasley Site, these are summarised as follows.

Transportation

- 2.47. A review has been undertaken by DTA on behalf of TSC of the Bridgnorth Options which has concluded that the transport evidence base supporting the Local Plan is deficient. DTA conclude that vehicular access has not been tested by the Council, which risks the delivery of all or a significant majority of the site. DTA also highlight the following concerns:-
- 2.48. Development at Tasley will increase demand to external destinations via the river crossings and through Low Town, to a materially greater extent than Stanmore by virtue of geography;
- The topography of Bridgnorth requires a broad mix of transport modes to ensure that the needs of all residents are met, such as those proposed at Stanmore. Only Stanmore has put forward cohesive proposals.
- 2.49. The SoCG13 for the Tasley Site states that the employment land should be sited in a gateway location, along the A458. Given the uncertainty over the access off the A458 and the site's lack of frontage, it is difficult to see how a gateway employment site can be created, with access through the SAMDev allocations, particularly as such an arrangement would involve taking access through land which is not in the control of the promoters.

Landscape and Visual Impact

- 2.50. TSC instructed Leyton Place, Landscape Architects to undertake a Landscape Comparative analysis of the Bridgnorth strategic growth locations. The study concludes that the Tasley site landscape is comparatively rural, remote, and peaceful with an absence of notable roads, traffic, and settlement. T. The A458 physically and perceptually separates Bridgnorth from the landscape to the west.
- 2.51. Overall, the Tasley site is considered to be a valued landscape having regard to paragraph 174 of the NPPF. As a minimum the valley and the Tasley site is of local high value – the landscape possesses qualities which are of value to the local and wider community beyond the principal settlement, with positive attributes outweighing detractors.
- 2.52. In comparison the Stanmore option to the east of Bridgnorth is a site is of local low value. The Stanmore landscape makes limited contribution to the local and wider community and has limited value – ‘everyday landscape’.

Employment Land

- 2.53. Proposed Site Allocation BRD030 requires that the employment provision should represent an intrinsic element of the development, occurring alongside and cross subsidised by the provision of housing. The Site Allocation requires that employment land is located in a gateway location on the site and be of a high-quality design and layout.
- 2.54. There is no evidence presented by the Tasley promoters to demonstrate that the provision of employment proposed is deliverable or viable. We presented evidence from Local Agents to accompany TSC’s Regulation 19 representations, which demonstrated that the employment element of the scheme would not be viable or deliverable, without being subsidised by the residential development.
- 2.55. Without a clear demonstration as to how the proposed employment within Tasley can be viably delivered to meet the Site Allocation requirements, the proposal cannot be justified or demonstrated to be deliverable and therefore is unsound.

Question 7

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

BRD030

- 2.56. Whilst the Tasley site (BRD030) is primarily flood zone 1 it has areas which are zoned flood risk 2 and 3 (ie a high risk of flooding).

P58a

- 2.57. The Stanmore site (P58a) is located entirely within flood zone 1 so is considered to be at low risk of flooding. The vulnerability to other sources of flooding show the Stanmore site is at very low risk of flooding.
- 2.58. The Stanmore site is therefore sequentially preferable.

Question 8

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

BRD030

- 2.59. The proposed Garden Village at Tasley requires the provision of strategic (primary) infrastructure to support the wider delivery of this new sustainable settlement in line with the allocation. This includes on and off-site strategic infrastructure. There is no evidence or information presented by the latest promoters as to how the strategic infrastructure will be funded, or what impact this will have on the viability of the proposal. It is vital to have an understanding of the viability of a scheme which is critical to the overall assessment of deliverability. Without a clear demonstration as to how the infrastructure can be viably

delivered to meet the Site Allocation requirements, the proposal cannot be justified or demonstrated to be deliverable and therefore is unsound.

P58a

- 2.60. The Stanmore site would form an extension to the existing business park and therefore would have access to an extensive range of services, facilities and infrastructure to support new development.

Question 9

Is the site realistically viable and deliverable?

BRD030

- 2.61. The proposal at Tasley relates to land in multiple ownerships, none of which are the promoters and all of which require formal legal arrangements, including an option and equalisation agreement, to be agreed with the owners if the site is to be delivered. Neither evidence of ownership nor equalisation agreements have been declared by the promoters.
- 2.62. In light of the above, there is a risk that the employment land proposed will not be delivered.

P58a

- 2.63. The proposed allocation of P58a would form an extension to the successful Stanmore Business Park, for which there is a proven demand; on this basis we are confident that employment use on the site is viable and can be delivered in the short term.
- 2.64. It is fully recognised by the Council that there is limited development potential on the existing Stanmore Business Park to meet the needs of expanding businesses or to accommodate new enterprises, over the medium- to long-term within the Local Plan review period. It is therefore considered that there is a strong case to support the viability and delivery of P58a.

Question 10

What is the expected timescale and rate of development and is this realistic?

BRD030

- 2.65. The SoCG13 for Tasley implies there is uncertainty with land ownership, site boundary. access and the required infrastructure to deliver the mixed-use scheme.
- 2.66. The Local Plan draft policy S31(i) sets out that *‘Employment provision will represent an intrinsic element of the development, occurring alongside and cross-subsidised by the provision of housing.’*
- 2.67. This suggests that the delivery of employment will be at a much later stage due to the reliance on profits from the housing phase of the development that will be used to support or offset the cost of employment provision.

P58a

- 2.68. It is expected that the Stanmore site could be brought forward immediately as there are no constraints that would hinder development, and the site would be a natural extension of the existing Stanmore Business Park.

Question 11

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

- 2.69. It is vital that the proposed development meets the stated requirements of the BRD030 (Policy S3.1(i)) in respect of the proposed Tasley Garden Village; any change to the site boundary would which impact the potential delivery, or the achievement of a sustainable community, should be considered very carefully and adjustments that reduce the prospect of achieving the aims of the policy should be resisted.
- 2.70. It is clear from the SoCG13 that the proposals for Tasley are now very fluid with a high level of uncertainty, and public consultation is still to take place. Given the advanced stage of the Local Plan, it is extraordinary that there are still discussions taking place and uncertainty over the red line boundary of the site; this clearly indicates that there are still issues with land ownership, which will almost certainly result in delays in implementation of the site and the delivery of the objectives of the Policy.
- 2.71. There is also uncertainty over the means of access to the proposed site, which we understand are subject to further consultation; this clearly demonstrates the issues over the deliverability of the site.

P58a

- 2.72. There this no requirement to amend the boundary of P58a.

Question 12

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

- 2.73. The Policy for BRD030 includes a requirement to prepare and produce an SPD, which is considered to be the appropriate way of delivering the allocation. In order to ensure the successful implementation of the exemplar sustainable community, required through Policy S3 and BRD030, the delivery of an SPD is preferable as it would enable the Council to take a central role in its delivery.
- 2.74. The SPD masterplan approach would still need to follow the above principles otherwise it would undermine the prospects of delivering a sustainable community.



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