

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

A0255

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

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A0514

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Shropshire Local Plan Review Examination

Stage 1: Matters, Issues and Questions

Matter 4: Housing and Employment Needs

Hearing Statement on behalf of Save Bridgnorth Greenbelt

Thursday 7th July 2022

Introduction

This Hearing Statement is the second of the following three statements prepared on behalf of *Save Bridgnorth Greenbelt* (SBG) and in response to the 'Stage 1 Matters Issues and Questions' raised by the Examiners:

- Matter 3 – Development Strategy
- Matter 4 – Housing and Employment Needs
- Matter 6 – Green Belt and Safeguarding Land.

This statement concentrates on issues relating to the "Housing and Employment Needs (Policy SP2)" and in particular as they relate to the proposal in the Draft Plan to allocate additional land adjacent to the Stanmore Business Park for employment development.

The Draft Plan contains other policies that are relevant to the *Save Bridgnorth Greenbelt* objection to the proposals at Stanmore, namely relating to Development Strategy (Policy SP1-SP15) and the Green Belt (Policy SP11) which are to be discussed in different sessions of Stage 1 of the Examination. We address those policies in our Matter 3 and Matter 6 statements as appropriate.

The evidence in SPG's three statements comprise a complete and coherent objection to the proposed allocations at Stanmore, and the Examiners are asked to have regard to all three of SBG's statements in considering each of Matters, 3, 4 and 6.

Summary of the objection

In brief, the objections submitted in respect of the Regulation 19 consultation draft of the Plan Review and which remain the *Save Bridgnorth Greenbelt*'s concerns are,

- i. The amount of land that has been calculated as being appropriate for development in the County is excessive, and the inclusion of the allocations proposed for Stanmore are unnecessary in terms of the overall need in the County.

- ii. The proposed allocations at Stanmore are unnecessary in terms of employment land supply for Bridgnorth, as the existing Stanmore Business Park is not operating to full capacity, and there is no evidence of excessive demand for those plots of land that exist on the site.
- iii. The proposed allocations are sited on land which is included in the West Midlands Green Belt, and no “exceptional circumstances” have been identified, evidenced or justified, which would indicate that the boundary of the Green Belt should be altered.

The Calculated Need for Employment Land

Policy SP2.2, in relation to employment land need, says that around 300 ha of employment land will be delivered in the County, and at a rate of 14 ha per annum. It also says that the Plan will ensure that this level of supply will be delivered “in the right locations” to achieve the plan’s growth aspirations.

Policy SP2.1 also indicates that development will be supported by necessary infrastructure and be of high-quality which responds to its setting, local needs and changing climate.

Further, Policy SP2.6 indicates that the growth will be concentrated in urban areas, Community Hubs and Community Clusters. Outside these settlements, it goes on to say, employment development will be “appropriate rural employment” and for economic diversification.

The Economic Needs Assessment, prepared by *Lichfields* for the Council in April 2021 (documents EV043) calculated the employment land needed for the County as being within the range of 128 ha. to 234 ha. between 2016 and 2038. This included flexibility, and assumed a significant allowance for the replacement of losses.

To this need, an additional allowance of up to 30 ha of employment land is to be provided to support the needs of the Black Country Plan. This would increase the employment land requirement to between 158 and 264 ha.

The Council then considered the matter further and determined that they wished to pursue a ‘balanced growth’ option for the development of the County. This resulted in the Council opting for a figure of 300 ha (rounded down from 304 ha) in the first version of the Employment Growth Topic Paper of 27 August 2021 (doc. EV112), though the basis for this calculation which increases the land requirement by just under 14%, is unclear. It does not appear to be justified by historic need for flexibility or any standard forecasting methodology.

Against this background, Appendix 6 to the Draft Plan indicates that the Council have provided for a total of 414 ha. of strategic land supply in the County, within the Plan period. This provision includes the employment land allocated for the ‘strategic’ sites of Ironbridge Former Power Station Site, near Telford (some 6.0 ha) and the Tern Hill Barracks site, near Market Drayton (6.0 ha). With supply running at 414 ha. there is clearly significant head-room for local variation in terms of quantity and quality, and the timing of provision. It is certainly not the case that there is a shortage of land available for the ‘step change’ in employment provision that the Council seeks, or that it is necessary to take land from the green belt in order to satisfy any shortfall in supply or to achieve the 300 ha. of land to which Policy SP13.1 proposes.

Policy S3 relates to the Place Plan area which includes Bridgnorth, and is a product of the strategic thinking behind the Draft Plan as a whole, and is thus likely to crop up as well. It is anticipated that Policy S3 might be scheduled for discussion in Stage 2 of the Examination, but, should the Inspectors believe it would be better considered at the Stage 1 Hearings, SBG will be happy to undertake that discussion during Stage 1.

Policy S3.1 indicates that Bridgnorth will deliver around 1,800 house and 49 ha. of employment land.

Appendix 6 to the Draft Plan indicates that the land supply in Bridgnorth will be provided as:

- i. 1.3 ha in existing employment areas
- ii. 0.3 ha on committed sites (presumably windfall sites)
- iii. 8.2 ha from “saved” allocations from the current SAMDev Plan, and
- iv. 27.4 ha from new allocations.

This totals some 37.7 ha.

Policy S3.1(i) indicates that some 16 ha. of employment land will be made available in the Tasley Garden Village development. This 16 ha. together with the two sites adjacent to the existing employment site at Stanmore, which are referred to in Policy S3.1(ii) and which, together, total 11.4 ha., adds up to the Appendix 6 total of 27.4 ha. of newly allocated land.

Policy S3.1 says that the development proposals for Bridgnorth will “contribute towards strategic growth objectives in the east of the County” and “make provision for the needs of the town and surrounding hinterland”. Development will be, Policy S3.1(ii) says, within primary use classes B2, B8 and appropriate sui generis uses. Further, that development will be targeted towards the engineering and advanced manufacturing sectors, to complement the employment offer on the existing Industrial Estate. It is appropriate, therefore, to consider the proposed employment allocations on strategic and local levels.

A ‘minor modification’ is proposed by the Council, to Policy S3.1(ii) in respect of both plots proposed for allocation at Stanmore (MiM 110 and MiM 111)¹. The modifications appear to widen the scope for non-B2 and B8 uses, even though the policy proposes to “target” engineering and advanced manufacturing sectors. This seems to SBG to be an unnecessary and unjustified loosening of the policy.

The SAMDev Plan (Policy S3.1), adopted in December 2015, proposed to provide land for 1,400 dwellings and around 13 ha of employment land. The employment land was to include 6.7 ha of land (net of landscaping) on site ELR011a at Tasley for Class B1, B2, B8 and ‘appropriate sui generis’ uses. A further 8 ha. of land that was undeveloped on existing employment sites (including 2.8 ha at Stanmore) was included on the overall employment portfolio for the town. In addition, 6.6 ha. of land (net of landscaping) was set aside at Tasley for the relocation of the Livestock market. If the livestock market were to close the 6.6 ha. of land was intended to be reserved for Class B1, B2 or B8 uses only.

In fact, neither of the Tasley sites has been developed in the SAMdev plan period, and Appendix 6 to the current Draft Plan shows that only 0.4 ha of land was developed in Bridgnorth in the period 2016-19.

¹ Marked at Plots STC002 and P58a in the Council’s Green Belt Review document.

Having said that there has been no progress towards producing employment development over the past seven years, a planning application for a mixed residential and commercial development was submitted to the Council on 2 November 2021 (L.A. Ref. No. 21/05023/OUT). The land, in part owned by the owner of one of the proposed allocated sites at Stanmore, includes both of the sites allocated in the SAMDev plan for employment development (sites ELR011a and ELR011b) as well as two sites allocated for mixed residential use, also at Tasley. The application had not yet been determined. However, apart from some unspecified employment development and the relocation of the livestock market, a number of other uses – a petrol filling station, a pub and hotel and allotments - are shown to be included on that land allocated in the SAMDev Plan for employment uses.

The proposal is indicated as coming forward in 5 phases with the employment development being in Phase 4, though no timetable has been offered. It is clear, however, that the employment development is unlikely to take place in the near future – another indicator that demand for employment land is not buoyant.

That scale of development does not indicate a significant demand for employment land, given that some 13 ha of new land and 8.0 ha of existing, serviced, employment land was readily available. It was clearly not the lack of available land that held back development.

In the 14-year period 2006 – 2020 the Council's "Authority Monitoring Report" (March 2020) showed that some 9.8 ha of land had been developed in the Bridgnorth Place Plan area (i.e. Bridgnorth itself, plus its rural hinterland which includes Alveley, Ditton Priors, Stanmore and a number of rural settlements). Again, this is not indicative of significant demand, or that demand which may have existed in that period was being held back by lack of available land. The fact that some 2.8 ha. of land at Stanmore was lying undeveloped does not indicate that firms operating from Stanmore could not expand because of lack of available land.

At Appendix A to this Statement is a plan which shows the extent of the existing Stanmore Employment Site together with the land that the Council now proposes to take out of green belt designation and allocate for unspecified employment uses.

At Appendix B to this Statement is a plan which identifies those areas of land within the existing Stanmore Employment site that are currently undeveloped, and have never been developed since the site became available for employment development in the 1960's. There is, clearly, readily available, serviced, land on the site which could have been developed had demand existed.

At Appendix C to this Statement is a list of businesses that currently operate from the existing Stanmore Employment Site. Those involving engineering operations are underlined and are in bold type.

At Appendix D to this Statement is a list of planning permissions granted in the period 1986 – 2022, taken from the Council's register of planning applications. It can be seen that the majority of permissions have been for extensions to, or remodelling of, existing buildings to satisfy the needs of businesses already operating on the site. There does not appear to have been any particular problem in expanding existing businesses on the site.

However, of the permissions that relate to new businesses entering the site, there is no indication that the majority are engaged in engineering and advanced manufacturing sectors. Indeed, permissions

have related to a variety of (former) Class B1, and Class B2, B8, D1, D2 and E uses as well as sui generis uses.

It is clearly not, at present, a centre for engineering and advanced manufacturing.

Two recent applications listed in Appendix D are of note.

In August 2021 a flexible planning permission (ref: 21/03808/FUL) was granted for the construction of 4 No. buildings (comprising 10 separate units) for B2, B8 or E(g) uses. Whilst applications to satisfy pre-commencement conditions have been approved, no work has so far been undertaken towards this construction of these units, indicating a lack of demand.

At present, an application (ref: 22/01264/FUL) is under consideration to change the use of a training facility in Building 10 to a general industrial use (B2) – although, possibly more correctly, the proposed use could be considered to be a sui generis use as the operation involves incineration.

Building 10 (identified on the Plan at Appendix B) had been in use, from 2018, by the Marches Centre of Manufacturing and Technology (MCMT). That operation had been funded by the Marches Local Enterprise Partnership with a multi-million pound grant to operate as an engineering school of excellence. However, in September 2021 MCMT moved location from Bridgnorth to Telford, in what must have been an expensive operation, and has now established on one of the several large employment estates in Telford.

At the time of the move, the MCMT Managing Director said, *“We have to be mindful of the market place and the large majority of leavers and companies, keen to access the MCMT, are located in Telford and Shrewsbury. Bridgnorth’s location, not to mention the lack of public transport, is a barrier – it is very difficult for young people to get to us (in Bridgnorth) without their own car”*.

Attached to this Statement at Appendix E are two press articles relating to the MCMT move away from Stanmore.

At Appendix F is a list of some of the Engineering companies that are located in Telford. Many of these have established there in the fairly recent past, indicating the strong preferences for businesses to be located at Telford which is just around 15km away from Bridgnorth.

The existence of the MCMT is likely to have been a major consideration in the Council’s promotion of further development at Stanmore for engineering and advanced manufacturing. However, that reason no longer exists, and the current operators on the site do not give credence to the idea that Stanmore is a centre of engineering or manufacturing excellence.

Telford is a very fast-growing town that has become a manufacturing and engineering hub. The town has lots of readily occupiable employment buildings on a number of large industrial estates and a wide spread of employment users. It accounts for 66% of Shropshire’s commercial rateable value. It is little wonder that employers find accommodation in Telford in preference to elsewhere in the County; there is a large workforce to operate any new Companies. At Appendix G is a list of Employers who operate in Telford, and many are engaged in engineering, at a high skills level. The town has excellent train and bus services connecting with other parts of Shropshire and the Black Country.

It is very clear that there is undeveloped land at Stanmore that could have been developed by now, had the level of demand that the Council claim actually existed. There is no indication from any source of the operators who might wish to be located at Stanmore, and there is obviously no operator standing back waiting for new premises to be constructed. There is no evidence, or guarantee, that the sites proposed for allocation would, indeed, be occupied by engineering or advanced manufacturing sectors. Indeed, as the Council indicate in Appendix 6 to the Draft Plan that the site would be “preferred for Recycling and Environmental Industries”, it would appear that the possibility of the Council being successful in their aspiration to establish a centre of excellence for engineering and advanced manufacturing’ is a long way from reality.

Given the likely significant level of over-supply of employment land needs in the County as a whole, and the very likely failure to take up all of the land newly allocated or saved in the Draft Plan, Save Bridgnorth Greenbelt consider it wholly unnecessary to allocate the sites (i.e. P58a and STC002) at Stanmore for employment. All that will achieve is that land will be taken out of the green belt without proper justification and without a specific justifiable reason for doing so. Such a situation would leave the land without any protection for future development which, given the possibility for development contained in Policy SP13.7 (referred to in the Statement relating to Green Belt Policy (Policy SP11), could lead to development other than employment taking place.

From the above, it is apparent that Stanmore is a standard, out-of-town business park, with vacant land and the wide range of actual and possible uses that you would expect to find in an out-of-town business park and doubtless the same needs as most business parks. Within the Shropshire context, it is by no means special.

In summary, the circumstances advanced in the Macmullen Associates report prepared by the promoters of Stanmore and repeated by the Council in its Green Belt Exceptional Circumstances Statement (December 2020) are both individually and taken together ‘common or garden’ for a business park of this nature. There is therefore no necessity for the level of employment land provision either in the County or in Bridgnorth, and there is certainly no exceptional circumstances to justify the release of plots STC002 and P58a from the green belt.

The proposed allocations at Stanmore are not justified and conflict with NPPF policy on greenbelt release contained at NPPF para 140 and 141. It follows that the allocations are in conflict with NPPF paragraphs 35 (b) & (d), and are therefore ‘unsound’.