



BRIDGNORTH TOWN COUNCIL

LJ/2019

✉ Tracy Johnson

Place Plan Officer, (Bridgnorth, Highley, Much Wenlock and Broseley)
Planning Policy and Economic Growth,
Shirehall,
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10th August 2019

Dear Tracy

Draft Bridgnorth Local Economic Growth Strategy 2017-2021

Bridgnorth Town Council welcomes the opportunity to comment on the subject document.

In forming a corporate response members were of the view that trying to produce something that 16 individuals could wholeheartedly agree with, around a complex subject, might prove to be difficult. There was some risk that finding a compromise between competing views might dilute the effectiveness of a submission. Indeed it might be in some matters both competing demands might have substance (because they both agree that the middle ground is unpalatable to all)

As a result, Bridgnorth Town Council has captured comments in the attached document from members and is submitting them all in order that they can all be considered.

Whilst you might consider the response a free for all I would ask you to consider:

- That not all councillors have responded (some councillors have trusted the judgment of their colleagues who have more or feel or informed view of this particular subject).

- That those councillors that have provided comment have provided those comments generally in line with and with consideration of previous Town Council discussions on related topics. They are relatively well informed.
- We acknowledge that the document has wide consultation and that differing views are likely to exist.
- That there are different types of comment; those that are about format and style and those that are about general content.

We trust that you will consider the comments in preparing further versions of the document.



Lee Jakeman
for Bridgnorth Town Council

Enclosure.

1. Bridgnorth Town Council Comments - Draft Bridgnorth Local Economic Growth Strategy 2017-2021.

Bridgnorth Town Council Comments - Draft Bridgnorth Local Economic Growth Strategy 2017-2021.

Page number	Reference	Comment	Contributor
3	Last but one paragraph in italics	<i>Capitalise sounds too weak and isn't a "Vision". This refers to "retaining" of skills whilst the main Shropshire Economic Growth Strategy refers to "developing and retaining talent and skills". A better Vision might be: "To sustainably enhance the economic well-being of Bridgnorth and its inhabitants by identifying and developing opportunities for investment, retaining and developing talent and skills, and providing appropriate infrastructure in a way which respects and preserves the built character of the Town and its natural assets".</i>	DC
3 / 4	Last Paragraph on page 3 and bullet points on page 4.	<p>Suggest these are re-ordered. They are a mixture of key themes and specific sectoral issues.</p> <p>Themes</p> <ul style="list-style-type: none"> • Actively and sustainably supporting economic growth whilst preserving the beauty of the town. • Capitalising on the towns close proximity to major economic centres and the West Midlands • Social sustainability – how to retain young people in the town. • Retaining and supporting key businesses • Capitalising on location as a nice place to live and work • Making Bridgnorth attractive to business • Improvements to infrastructure to support growth, particularly around transport in and around the town. <p>Sectoral issues</p> <ul style="list-style-type: none"> • Provision of accommodation to attract visitors encouraging overnight stays rather than day visits. (Assumed to be raised in the context of tourism, but has also been considered an issue by businesses) • Development suggestions around leisure and the riverside • Promotion of the town's attractions such as the Severn Valley Railway. • Opportunities to promote the town as a destination • Extra car parking provision and viability in High Town? 	DC
4	1. 2 nd paragraph	(The main economic growth strategy document has a heading "Strategic Location and Economic Relationships at this point, and refers to alignment with the Midlands Engine strategy.	DC

4	Last paragraph first sentence	what does this mean? In particular, what “return” would be taken into account in prioritising the bringing forward of sites. In my view this should be community benefit/ value added.	DC
4	Last paragraph first sentence	? Replace and economic with and employment	DC
5	AC1.1 Action Delivery	Surely the action is to determine what their requirements are and look at how they can be met?	DC
5	AC1.2 – Ambition	A better description might be: “Identify likely employment land requirements over the local plan review period	DC
5	AC1.2 Action Delivery 1 st paragraph	When was this study and where can this be found?	DC
6	First Paragraph line 6	Whitchurch?	DC
6	Picture	Not sure what the relevance of this is. The graphic seemingly shows the site S of the A458 at Tasley allocated for a relocated livestock market and other employment use, the description seems to relate to Stanmore Industrial Estate and sites off Stourbridge Road?	DC
7	Infographic red text	No they’re not! Manufacturing is a major employment sector, healthcare is less significant in Bridgnorth than in other locations.	DC
7	2 nd paragraph	What about facilitating the location/ development of businesses in sectors aligned to existing businesses – e.g. with a potential supplier/ customer relationship or based on a similar employee skill base? (This appears to be the point of AC2.1 below, which is otherwise unexplained.)	DC
7	3 rd paragraph	It’s not obvious that the major implication of Brexit for businesses in the Bridgnorth area is the impact on agriculture. Perhaps more concerning is the impact on cross-border trade for our manufacturing businesses.	DC
8	Last paragraph	Action point?	DC

9	1 st paragraph	Who? Shropshire Council?	DC
10	AC3.2 - Action Delivery	Doesn't fit the Bridgnorth circumstance of having a major employment site located in Worfield parish.	DC
10	AC3.3 - Action Delivery	Where does the Town Council come into this?	DC
11	AC3.4 - Action Delivery	Established demand or anticipated? Why only reference workshops, what about office space which is perceived as being in short supply?	DC
12	AC4.4 – Ambition	A bus service that help workers/trainees / shoppers/ tourists. Should look at mode substitution more generally in the LTP	DC
14	AC7.1	What type/ density/ affordability of housing of housing for this site? “Sustainable housing growth” implies that we know what is needed to meet local demand and prospective demand from workers. We should have a statement of what that is or how it is to be determined. This should also be tied into the need to retain younger people in the Town – is the housing stock appropriate for that objective?	DC
15	4. - Infographic	Very marginally better than the Shropshire average and it's 2011 census data (per Market Town Profile)	DC
General Comment		General point about the action plans – they describe things as being due to happen “Immediately” or over the “short/ medium term” as per the main Shropshire Economic Growth Strategy. What is the definition of those terms? A specific target date would be preferable.	DC
General Comment		In general terms I find the draft document very disappointing. It contains many aspirations and very generalised ideas, but on the other hand is lacking in proper research or proactive steps to attract new businesses or to assist expansion of those already existing. It has to be recognised that Shropshire Council's role in the decision making process undertaken by businesses in setting up, relocating, expanding etc. is limited. It also has to be recognised that Shropshire Council have considerable financial difficulties. On the other hand new and expanded businesses will generate additional business rates that will benefit that Council. Shropshire has an important role to play in providing the environment, the land and the infrastructure	RW

		<p>that encourages businesses to invest in a particular area. Unfortunately the draft is almost completely lacking in specific plans, commitments or investment intentions to fulfil that role.</p> <p>As a consequence it is my view that the draft should not be adopted in its present form until the issues identified above are addressed and that a clear understanding of the market is identified.</p>	
<p>General Comment</p>		<p>Response to the draft of the Local Economic Growth Strategy for Bridgnorth Clive Dyson - 1st August 2019</p> <p><i>[Note; I have written this response to the draft Local Economic Growth Strategy to a short deadline. It is intended to be constructive and identify issues, in advance of a finalised document being produced.]</i></p> <p>Summary and Conclusions</p> <p>I am very disappointed by the draft strategy. Its title implies that it will be a complete strategy to assist economic growth in the Bridgnorth area. It is no such thing. To be positive, it does list the things that Shropshire Council, with a very limited budget, plan to do. This is worthwhile in itself, but this is not a strategy. To avoid setting unrealistic expectations, I suggest that the document is revised so that it is not presented as a strategy at all. A better title might be something like “Supporting business around Bridgnorth – what Shropshire Council is doing.” That avoids people expecting to read an economic growth strategy that has real strategic content and identifies meaningful funding. Presented in this less ambitious manner, it would be worthy of being consulted on. Work could then restart to develop a meaningful strategy, in conjunction with local businesses, organisations and residents.</p> <p>Background</p> <p>The draft of the Local Economic Growth Strategy was distributed, on about the 12th July 2019, to those who had been consulted previously. The consultation workshop, facilitated by Bridgnorth Town Council, was held in August 2018 and we were promised a draft document by the end of the year. After all the delay, the resultant draft is not what I consider to be a strategy at all. I’m used to business strategies, and I expect them to contain supporting information and analysis, leading to an approach to take. They usually go on to explain where the</p>	<p>CD</p>

funds and abilities will come from and lead on to an action plan. Instead we have received a document centred on the Local Plan Review, accompanied by some limited, and in no way sufficient, actions that Shropshire Council intend to carry out as part of their ongoing business support programme.

Comments on the draft Local Economic Growth Strategy for Bridgnorth

The following comments on the sections of the draft strategy in turn:

Forward

This refers to the *Economic Growth Strategy* and its priority actions and targets. The draft is said to be aligned with it.

It says that Bridgnorth has “... a unique opportunity for businesses looking to invest and grow.” But the document does not say what this unique opportunity is. What is our USP?

Bridgnorth – A Local Profile

This section gives a superficial overview of the town. It says it is picturesque, has a rare split between High Town and Low Town, the Severn Valley Railway, shops and hospitality, some businesses, and MCMT. But what are our strengths and weaknesses?

Economic Growth Strategy for Shropshire 2017-2021

Vision for Shropshire: “*To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets.*” This is a typical, poor, vision statement – it doesn’t say anything.

Three objectives:

- Supporting and growing new and existing businesses.
- Attracting inward investment.
- Developing and retaining talent and skills.

Each Local Economic Growth Strategy will deliver the vision from a local perspective and be managed through a detailed action plan contained within the strategy to:

1. Target actions and resources where there are economic opportunities.
2. Enable businesses to start, grow and succeed.

	<p>3. Deliver infrastructure to support growth. 4. Meet skills needs of business and people’s aspirations for work. 5. Promote Bridgnorth to investors. <i>“Shropshire Council must engage effectively to communicate our growth ambitions and what is being done to achieve them.”</i> The delay and lack of contact since August 2018 is not a good start. <i>“Collaborative approach.”</i> Yes please – it would be nice if any were visible.</p> <p>An Economic Vision for Bridgnorth</p> <p>PROPOSED Vision for Bridgnorth (apparently formed collaboratively, and informed by, engagement with the town and parishes): <i>“To capitalise on opportunities for growth, investment and the retaining of skills through sustainable development and social sustainability, whilst preserving and enhancing the beauty and appeal of the town.”</i> Again, this doesn’t say anything much - it implies that we won’t knock anything down. Key themes (from one consultation meeting):</p> <ul style="list-style-type: none"> • Actively and sustainably supporting economic growth whilst preserving the beauty of the town. • Provision of accommodation to attract visitors encouraging overnight stays rather than day visits. • Capitalising on the town’s close proximity to major economic centres and the West Midlands. • Retaining and supporting key businesses. • Social sustainability – how to retain young people in the town. • Development suggestions around leisure and the riverside • Improvements to infrastructure to support growth, particularly around transport in and around the town. • Capitalising on location as a nice place to live and work. • Promotion of the town’s attractions such as the Severn Valley Railway. • Making Bridgnorth attractive to business. • Opportunities to promote the town as a destination. • Extra car parking provision and viability. <p>This is not a strategic analysis of the situation. It just collects some ideas thrown on the table at a meeting. How big is the retail sector in Bridgnorth and how many people</p>	
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		<p>work in it? Services? Manufacturing? Hospitality? How can a document be presented as a strategy when there is no information provided to its support conclusions? The draft document then dives into an action plan following the structure of the Economic Growth Strategy:</p> <p>Target actions and resources where there are economic opportunities <i>“... key opportunities ... have been identified through the preparation of this strategy.”</i> <i>“These will ... guide the key actions to ensure that Shropshire Council maximise and promote these opportunities for the economic growth of Bridgnorth.”</i> What are they then? <i>“All development will need to take account of known infrastructure constraints and requirements, as identified in the place plan and Local Development Framework implementation plan.”</i></p> <p>In my opinion the Place Plan system doesn’t work. It collects, after the event, a list of things that parish councils might want to see done. This is not strategic – it is purely reactive. The necessary infrastructure that will be required for any iteration of the Local Plan should be identified as that plan is created, along with identifying the funding required. That should be the plan to be implemented. Without it the Local Plan is simply a framework that developers have to work in, but within which their developments may be islands that cannot function and degrade the local community. As an aside, what is the “Local Development Framework implementation plan”?</p> <p>1. Major employment sites and growth corridors This section just says, “Implement the sites proposed in SAMDev and the LPR”.</p> <p>AC1.1 Release Green Belt land. AC1.2 BE Group say that there is actually little demand and that growth can be in Telford and Wolverhampton. Why was this not mentioned in the LPR consultation? SC still have to carry out a need and demand survey. This should already be in any strategy document, providing facts to support the strategy. AC1.3 Sites identified in SAMDev and LPR, but this action is to produce an investment proposition. I’ve no problem with the need to attract (the correct)</p>	
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		<p>businesses. But it is inconsistent to say that there is clear demand and also say that a big sales drive is needed to find demand. These actions are just paperwork. What incentives will be provided? How will these be funded? How will the required infrastructure be funded? What milestones have to be achieved?</p> <p>This section goes on to repeat what is in SAMDev and the LPR proposals. There is nothing in the section about “growth corridors” even though it is in the title. This may be a relic from wording for the Shrewsbury to Hereford corridor? However, it is notable that the Economic Growth Strategy itself does not provide for any improvement in the road network around Bridgnorth, suitable to support significant development around the town.</p> <p>2. Target growing and under-represented sectors</p> <p>[Infographic: The three largest employment sectors in Bridgnorth are retail, health and transport & storage] But we can’t see this to comment.</p> <p>This section starts by saying that SC will look to understand what can benefit business in Bridgnorth. The strategy appears to be that a business support team (based in Shrewsbury) will try to find out how it can help the town. Again, this is not a strategy. That can only be written when the results of this work are known.</p> <p>Sectors for the whole of Shropshire are listed:</p> <ul style="list-style-type: none"> • Advanced Manufacturing including Engineering and Agri-tech. • Food and Drink Processing. • Health and Social Care. • Environmental Science and Technologies. • Creative and Digital Industries. <p>And they add (possibly with little evidence):</p> <ul style="list-style-type: none"> • Professional and Business Services • Construction <p>I note that these cover a large proportion of business activity in the UK. Why are they particularly relevant to Shropshire in general and Bridgnorth in particular?</p> <p>AC2.1 Do some paperwork that should already have been done to write the strategy! How big are each of these sectors in the UK? For each, why is a rural location on the extreme edge of a major conurbation advantageous. I’d be more impressed by a strategy that said, for example, that “we don’t know which sectors to target, but most businesses need modern office space, good data comms and</p>	
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reasonable travel infrastructure. We will provide the funding for this in this way on these timescales.”

3. Identifying External Funding Opportunities

Haven't these been identified yet?

Apparently, the available funding sources are:

- Growth Deal and similar Government funds – that is “central government might give us something”. Can't we be more specific? You can't have a strategy unless you can be specific about how it is funded.
- European Structural and Investment Funds – does this assume that Brexit is not happening? If it is, do we have guaranteed central government funding to replace it/
- Prudential borrowing – of course.

What about funding for highways, sustainability, agriculture, medical services provision, utilities ... is available?

4. Enable businesses to start, grow and succeed

“There is a drive to be more accessible and visible across Shropshire for the local business communities. A move away from being deemed Shrewsbury centric”

For example, hold a consultation on Economic Growth in August 2018, and then go away and produce a (very limited) draft strategy for consultation in July 2019, with no interim contact that I am aware of.

Have local businesses heard of business support from the following?

- The Marches Growth Hub
- The Growth Hub located at the Shropshire Food Enterprise Centre
- The satellite office based in Bridgnorth at the MCMT.

The proposal is to continue to provide business support as per usual. *“continuing effective engagement ...”* That is sensible given the resources. Is it good enough?

What is needed?

AC3.1 Explore delivery options in Bridgnorth. Activities, events and surgeries. *“.. they would not have engaged with the Growth Hub if they hadn't gone out to the businesses.”* In summary, business as usual. No specified / allocated staffing or funding for Bridgnorth.

AC3.2 Support existing businesses. To precis: we don't know what to do, but will talk,

		<p>including to the Town Council (which has no responsibility or funds for this).</p> <p>AC3.3 Succession planning. Town Council (is this staff or elected councillors?). Unspecified help to businesses.</p> <p>AC3.4 Incubation units. A report has been written and something might be done.</p> <p>AC3.5 No such action.</p> <p>AC3.6 Shropshire Business Board. Last met December 2017 (according to SC website) and is just a talking shop that meets infrequently. This is stated to be “A key partner”.</p> <p>5. Deliver infrastructure to support growth</p> <p>Says that there needs to be infrastructure. The Place Plan apparently already does or will list it. Shouldn't it be in the Local Plan and a delivery plan and funding already by in place, with one almost ready to match the ongoing LPR?</p> <p>I consider the Place Plan system to be unfit for purpose, ill-defined and broken. It is most disturbing to see a strategy document relying on a reactive, after the event, process.</p> <p>6. Transport Infrastructure</p> <p><i>“Shropshire Council will continue working closely with statutory bodies such as Highways England to improve and secure funding for strategic road networks that are key for supporting Growth in Bridgnorth.”</i> What specific new road links will we have?</p> <p>AC4.1 Transport links: There needs to be a review. We don't know what is needed.</p> <p>AC4.2 Traffic, traffic plans and pollution: We don't know what to do. The Place Plan will solve it.</p> <p>AC4.3 Extra car parking: the need appears to be accepted. Why is there no action to write it explicitly in the LPR.</p> <p>AC4.4 Bus service. SC has just consulted on reducing bus services and they are already inadequate. Could we please have some coordination within SC.</p> <p>Digital Connectivity</p> <p><i>“Digital connectivity is now fundamental for business.”</i></p> <p>AC5.1 Rural high-speed broadband. Up to £25,000 to (rural) businesses to support connection to superfast broadband.</p> <p>This is good, but what about expanding bandwidth to the town and industrial estates?</p> <p>7. Utilities Capacity</p>	
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		<p>We can list the need to check sewers, electricity, gas, local renewables, EV charging ...</p> <p>The only ambition is to influence the provision of more high-voltage supply lines: AC6.1 Electricity supply for large companies. Yes, but SC have declared a climate emergency. Does this have a local impact? Could the industrial estates be clad with solar PV? Is there any suitable low-quality land that is out of sight for PV? Do we tolerate some wind turbines, if it really is an emergency?</p> <p>8. Housing AC7.1 Implement SAMDev and the LPR. No justification (but this is not the place for it). But neither is there any discussion of the type of housing the economic growth strategy might imply. Or of climate emergency implications.</p> <p>9. Local Place Infrastructure The Town Council, in its response to Stage 3 of the LPR, identified a long list of infrastructure requirements that need addressing for SAMDev and, in addition, if the LPR proposals were to go ahead. Why are they not in this section? It just has: AC8.1 Flooding at the Hobbins. Needed, but not strategic (key to a strategy). AC8.2 Car parking. So, what will be done about it. How will it be funded? Who will own it? Could current parking be transferred to the Town Council? The Town Council could potentially borrow, or find other ways, to add more.</p> <p>10. Local Place Infrastructure – Focus on Health Some wording on how medical facilities might be provided. Mainly jargon. We are left to research the One Public Estate (OPE) programme. No ambition or action.</p> <p>11. Meet skills needs and people’s aspirations for work Just a reference to a separate skills strategy. Sensible to do this, but needs to be reviewed separately. AC9.1 No such ambition / action. AC9.2 Higher skilled jobs. The action seems to have no link to the ambition. The action looks to be the skills strategy. AC9.3 Retention of younger people. An Enterprise Adviser. Careers. Why not an ambition to attract people back after they have spent a while in the cities?</p>	
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		<p>The MCMT is clearly welcome. Is it having an effect?</p> <p>12. Promote Bridgnorth to investors</p> <p>Broadly to follow www.investinshropshire.co.uk.</p> <p>AC10.1 Promote Bridgnorth. Action is to do some planning. What is the strategy?</p>	
General Comment		<p>This is clearly a Shropshire Council document that covers a 5 year period that commenced in 2017. The document sets out the aims and objectives of Shropshire Council for Shropshire and how the local Bridgnorth economy fits into the overall scheme. There is a statement <i>that 'the vision for Bridgnorth has been formed collaboratively, and informed by, engagement with the town and parishes'</i>. There is very little evidence within the document to support this statement.</p> <p>Shropshire Council seem to acknowledge that there is a problem regarding the involvement of local communities. Under Part 2 Enable Business to Start, Grow and Succeed, there is this interesting comment. <i>There is a desire to be more accessible and visible across Shropshire for the local business communities. A move away from being deemed Shrewsbury centric.</i></p> <p>There is very little mention of Bridgnorth Town Council involvement, apart from the following:</p> <p><i>AC1.2 Opportunity to look at accommodation provision in the town. Suitable hotel sites.</i></p> <p><i>AC4.3 Extra car parking provision</i></p> <p><i>AC5.3 High speed broadband outside of town to support business operating in the rural hinterland. There is a need to identify key corridors that will require ultrafast/full fibre/SG requirements etc.</i></p> <p><i>AC10.1 Promote Bridgnorth both as a destination and an investment.</i></p> <p>There is no evidence that Shropshire Council, its officers or councillors, has tried to raise and discuss any of these specific matters with Bridgnorth Town Council.</p> <p>With regard to a possible hotel site, public meetings within the town specifically mentioned the possibility of using the redundant Westgate council office site for a hotel and employment opportunities, but the owners of that site, Shropshire Council, were clearly not interested; they are determined to allocate it for housing.</p> <p>It seems strange to suggest that the Town Council be involved in identifying key corridors for broadband for the rural hinterland?</p>	EM