

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

<b>Representor unique Part A Ref *</b>	<b>A0455</b>
<b>Matter</b>	<b>3</b>
<b>Relevant questions nos</b>	<b>3, 4, 17, 18, 19</b>

\*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/>

# Shropshire Local Plan 2016- 2038 Hearing Statement

## Matter 3 - Development Strategy

### (Policies SP1 – SP15)

#### Land at Clive Barracks

Prepared by Fisher German LLP on behalf of The Defence  
Infrastructure Organisation

May 2022

### Project Title

Land at Clive Barracks, Tern Hill, Shropshire

### Agent

Fisher German LLP

### Contact details

The Estates Office

Norman Court

Ashby de la Zouch

LE65 2UZ

07587 033060

# Contents

1. Introduction .....	4
2. Question 3.....	5
3. Question 4.....	5
4. Question 17 .....	6
5. Question 18 .....	7
6. Question 19 .....	8



## 2. Question 3

What is the basis for the overall spatial strategy and broad distribution of growth set out in Policy SP2? What options were considered and why was this chosen?

2.1 The overarching spatial strategy adopted by Shropshire is that of 'Urban Focused' distribution of development. Notwithstanding this the rural areas are to accommodate a not insignificant level of growth; reflecting the rural nature of much of Shropshire and the requirement to ensure rural areas remain vibrant and continue to function sustainability. To deliver this strategy, the Plan proposed the following broad distribution (Reg 19 SA page 92):

- Shrewsbury – around 30%
- Principal Centres – around 24.5%
- Key Centres – around 18%
- Rural Areas – around 27.5%

2.2 The above distribution excludes development at the 'Strategic Settlements'. Given the nature of these sites, this approach is considered appropriate so as to not impact the overall pattern of development and to enable growth in the existing rural settlements which the Council has acknowledged to be important for the ongoing vitality and viability of the settlements.

2.3 The approach adopted by the Council in this respect is considered sound, focusing development in urban areas predominantly, whilst still recognising the benefit of dispersed growth and the unique opportunities afforded on strategic predominantly brownfield sites such as Clive Barracks.

## 3. Question 4

Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?

3.1 It is considered that Policy SP2 should define the quantum of development the Plan is seeking to allocate within both the settlements and the 'Strategic Settlements'. This would clearly aid Plan legibility, ensure transparency, and help parties understand the distribution of growth in real terms.

## 4. Question 17

### Is Policy SP12 justified, effective and consistent with national policy?

- 4.1 Policy SP12 is justified, effective and consistent with national policy.
- 4.2 The policy seeks to support economic growth and investment along the 'Strategic Corridors' and within the 'Strategic Settlements'. Clive Barracks, which is a proposed strategic settlement straddling the A41, clearly constitutes a location appropriate for economic development. The proposed development will deliver approximately 6 hectares of employment generating land. The DIO remains committed to working with the Council to ensure that the employment opportunities at Clive Barracks are responsive to local need, market demands and the aspirations of the economic growth strategy for Shropshire in accordance with Policy SP12. As detailed within the SoCG flexibility over the nature of employment generating uses at Clive Barracks will however be key in ensuring the success of this aspect of the scheme. Given development at Clive Barracks is not likely to commence until 2029, there is significant scope for variation in employment needs. Further engagement between the DIO and SC will occur over the coming years to ensure the employment provided is suitable in that economic climate, providing jobs for the new community and beyond.

## 5. Question 18

### Is Policy SP13 justified effective and consistent with national policy? Should figure SP13.1 text be included within Policy SP13?

5.1 Policy SP13 is justified, effective and consistent with national policy.

5.2 The employment target of 300 hectares (ha) is based on robust evidence contained within the Shropshire Economic Development Needs Assessment (April 2021) (EVO46) and wider planning considerations. The Economic Development Needs Assessment sets out that the overall employment land requirement for Shropshire is a range is between 128 ha and 234 ha, with the former relating to 2014-based projections and the latter representing historic take up. The overall requirement also includes an allocation of 30 ha of employment needs of the emerging Black Country Plan, where existing evidence demonstrates that delivery is constrained. The remainder of the land enables choice and competition in the market to support delivery and to ensure a broad portfolio of land which can meet different requirements. The inclusion of a significant buffer is effective in this regard, as it is the most efficient tool to ensure that development needs are met in full. This links into the Plan's wider aims to achieve economic growth and is fully supported.

5.3 NPPF paragraph 82 states that planning policies should "*be flexible enough to accommodate needs not anticipated in the plan*". The overprovision of employment means the Plan is 'future-proofed' should economic needs and demands change. This is particularly pertinent given the issues around the larger West Midlands conurbations who are struggling to meet their own needs, which may force businesses to look further afield for new opportunities. The Plan as proposed can respond positively to this should other areas fail to deliver suitable growth.

5.4 In respect of the employment composition to be delivered on employment sites, DIO support the flexible approach endorsed by Policy SP13. The policy provides for a wide range of uses, rather than a strict adherence to industrial B-Class uses and offices. We fully support this approach as it accords with Paragraph 82 of the framework which advocates for a flexibility in approach. The approach is proportionate, providing a hierarchy of uses and ensuring more traditional employment generating uses are recognised as the primary uses within employment areas, whilst still enabling the sensible delivery of secondary employment generating uses and ancillary uses. Part 3 of the Policy contains a number of criteria to ensure that proposals will be acceptable and not result in unacceptable impacts. This policy approach enables the Council to adopt a flexible and pragmatic approach to applications. It also encourages proposals which will serve to deliver economic growth, whilst



enabling the Council to refuse schemes which would be unacceptable. As such we consider the proposed policy to be pragmatic and sound, thus it is supported.

## 6. Question 19

Is Policy SP14 justified effective and consistent with national policy? Should the corridors be marked on a map or plan? Is this policy consistent with other policies in the Local Plan? Is it the purpose of this policy to allow for significant growth in addition to that allocated in the Local Plan, including development in the Green Belt?

- 6.1 Policy SP14 is justified, effective and consistent with national policy. The Policy seeks to deliver a pattern of development which takes account of key transport routes, as part of a wider spatial approach of urban concentration. This means that development not located in the urban areas will be located where possible, and appropriate, on key arterial routes. It is noted that this approach still facilitates appropriate development away from these routes and does not preclude development in the rural areas.
- 6.2 Policy SP14 sets out a hierarchy of locations, following the pattern of urban concentration, with development being located and considered most acceptable in locations higher up the hierarchy. This approach accords with the adopted spatial approach but enables the distribution of growth in a commensurate manner down the spatial hierarchy. This approach supports delivery, as it will enable the delivery of varying sites, serving differing markets, which will support concurrent delivery.
- 6.3 Criteria 3 of Policy SP14 sets out the sequential preference for development on the 'Strategic Corridors'. Part b of Criteria 3 makes reference to 'Strategic Sites' but for consistency with other policies within the Plan this needs to be updated to also include reference to 'Strategic Settlements'.