

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor unique Part A Ref *	A0601
Matter	Matter 3
Relevant questions nos	Question 3 Question 5 Question 6 Question 8 Question 9 Question 14 Question 17 Question 18
Nexus Planning on behalf of Lands Improvement Holdings	

Stage 1 Hearing Statement

*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/>



NEXUS
PLANNING

Shropshire Local Plan Examination

Matter 3 Hearing Statement

On behalf of Lands Improvement Holdings (ID. A0601)

May 2022

Overview

1. This Statement has been prepared by Nexus Planning on behalf of Lands Improvement Holdings (“LIH”) (respondent ID. A0601) with respect to the land south of Oteley Road within the Shrewsbury South Strategic Urban Extension (“SUE”). The Shrewsbury South SUE is identified as a ‘saved site’ within the Shropshire Local Plan Review (“the Plan”) having been initially allocated by the Shropshire Core Strategy 2006-2026 (2011).
2. We provide a summary of the key matters that are of direct relevance to each of the relevant Questions of this Matter below, but continue to rely on our representations to the Regulation 19 consultation, dated February 2021.

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?

3. Paragraph 105 of the National Planning Policy Framework (“the Framework”) requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes.
4. The Plan is informed by the Council’s ‘Hierarchy of Settlements’ evidence base document (EV060), dated August 2020. Table 10 (within Appendix C) of this document demonstrates that Shrewsbury contains the widest range of services and facilities of any of the settlements within Shropshire. As a result, it is concluded to be the only ‘Strategic centre’ within the County. As such, focusing development at Shrewsbury and the other urban centres identified through the ‘Hierarchy of Settlements’ document is consistent with paragraph 105 of the Framework.
5. In considering the spatial distribution of development the Regulation 19 Sustainability Appraisal (“SA”) (SD006) considered three options:
 - Option A – Rural Rebalance
 - Option B – Urban Focus

- Option C – Balanced Growth
6. The SA concluded that Options A and C did not deliver significant positive effects against any of the SA objectives, whilst Option B delivered significant positive effects against seven of the objectives.
7. In assessing Policy SP2 (Strategic Approach), Appendix A of the SA concludes that it delivers positive effects against a range of SA Objectives, including:
- Promote access to services for all sections of society;
 - Encourage the use of sustainable means of travel;
 - Reduce the need of people to travel by car.
8. As such, the Plan's spatial strategy and distribution of development is justified and consistent with national policy.

Question 5 – The spatial strategy in the Core Strategy has a rural focus, while the submitted Local Plan's spatial strategy is urban focussed. The latter holds a list of 'saved sites' in appendix 2 which the Council intends to rely upon to meet the new spatial strategy and development requirements. Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan? What will be the policy basis for these 'saved sites'? By relying upon such an approach, is the Local Plan positively prepared, justified, effective and consistent with national policy?

Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan?

9. 'Saved site' S16 – Shrewsbury South SUE – is consistent with the Plan's spatial strategy of focusing development at Shrewsbury, as set out at Policy SP2. The Plan rightly identifies Shrewsbury as the focus of development within Shropshire, an approach which is consistent with paragraph 105 of the

Framework’s requirement for the planning system to limit the need to travel through focusing significant development at locations that are sustainable.

What will be the policy basis for these ‘saved sites’?

10. In the submitted Plan, the policy basis for the ‘saved sites’ is simply that they are ‘saved’ policies from the 2011 Core Strategy and the 2015 Site Allocations and Management of Development Plan 2006-2026 (“SAMDev”).

11. For the reasons outlined below, this is approach is unsound.

By relying on such an approach, is the Local Plan positively prepared, justified, effective and consistent with National Policy?

12. No.

13. In considering the principle of including ‘saved sites’ within the Plan it is particularly pertinent to have regard to paragraph 122 of the Framework, which states that:

“Planning policies and decisions need to reflect the changes in demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) It should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs [...];

[...]”

(Emphasis added)

14. Through simply ‘saving’ the existing allocations of the Core Strategy and SAMDev, the Plan has failed to accord with the requirements of paragraph 122 of the Framework as it has not assessed whether there has been a change in demand for the land uses at these ‘saved sites’ (as demonstrated through the absence of consideration of the saved sites within the Sustainability Appraisal or other evidence

base documents – see our Matter 1 Hearing Statement). As such, the Plan is not consistent with national policy and is unsound having regard to paragraph 35 of the Framework.

15. To illustrate this point, and the implications of failing to undertake the above re-assessment, the uses allocated at the land south of Oteley Road within the Shrewsbury South SUE no longer reflect the demand for land. The site is sustainably located and was allocated in the Shropshire Core Strategy (February 2011) and informed by an evidence base that pre-dates this. Indeed, the Core Strategy Issues and Options consultation document (January 2009) identifies that the Shrewsbury South SUE was identified as an option for growth as far back as 13 years ago (and likely further given that this will have been informed by initial evidence gathering).
16. A significant amount of time has elapsed since the Shrewsbury South SUE was first allocated and in this time there has been a change in demand for land.
17. Consistent with the Core Strategy, outline planning permission was secured in 2015 (Ref: 14/04428/OU) for up to 550 dwellings and up to 23ha (gross) of commercial development. However, since the Core Strategy allocation (and since this outline permission) LIH has marketed the employment land to the south of Oteley Road within the SUE for in excess of seven years but has only received interest in one parcel located to the south-east of Meole Brace Retain Park. At the same time, there is significant demand for the dwellings delivered on the remainder of the site to the south of Oteley Road, illustrating a strong demand for housing in this sustainable location.
18. Noting that Stage 1 of the Examination is not considering site-specific matters, we reserve the opportunity to provide evidence to support these concerns through Stage 2 Hearing Statements and at the relevant Hearing Sessions that consider site-specific matters.
19. Notwithstanding this, the above clearly highlights that the Plan is unsound as the Council has not reviewed the uses allocated within the 'saved sites' based on current circumstances.
20. In order for the Plan to be found sound, each of the 'saved sites' should be re-appraised in accordance with paragraph 122 of the Framework, and subsequently re-allocated (or not) for an appropriate range of uses based on up-to-date evidence relevant to demand. The need to re-appraise the 'saved sites' is highlighted in the context of our response to Question 18 of this Matter and our Matter 4 Statement,

which demonstrate an underestimation of the housing provision required to meet the employment land requirement.

Question 6 – Is it appropriate to show ‘saved sites’ on the proposals map given they are not site allocations in the submitted Local Plan, bearing in mind regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012

21. Having regard to our response to Question 5 of this Matter, the ‘saved sites’ should be re-allocated within the Plan with a mix of uses that reflects up-to-date evidence with respect to the demand for land, in line with paragraph 122 of the Framework.

Question 8 – What proportion of the ‘saved sites’ have an extant planning permission and what is their level of contribution to the housing supply?

22. With specific regard to the Shrewsbury South SUE, the part of the allocation located to the south of Oteley Road benefits from planning permission (Ref. 14/04428/OUT), granted in 2015 for up to 550 dwellings, up to 23ha (gross) of commercial development, with associated uses and infrastructure.
23. The residential element of this planning permission all now benefits from various reserved matters approvals and has (mostly) been built out. As the Plan period extends back to 2016, much (if not all) of the housing delivery from this site will contribute towards the Plan’s completions. A more recent planning permission (ref. 21/02982/OUT) secured the principle of a further 35 dwellings within the SUE. There is no current reserved matters application for this but the site has recently been purchased by a housebuilder and will be coming forward over the next few years.
24. As such, it is evident that the Shrewsbury South SUE is a reliable source of housing delivery where there is a high demand for residential development.
25. In terms of the remainder of the land south of Oteley Road within the Shrewsbury South SUE, which is subject to planning permission for employment uses, this has yet to come forward. As evidenced in response to Question 5 of this Matter, the demand for employment uses at the Site has changed since the site was allocated in 2011 (based on an evidence base that pre-dates this).

26. In the context of paragraph 122 of the Framework, the Plan should seek to re-allocate the remaining parts of the Shrewsbury South SUE for a mix of uses that more appropriately reflects current demand.
27. We reserve the opportunity to provide further evidence in terms of the demand for land within the Shrewsbury South SUE through Stage 2 EiP Hearing Statements and at the relevant Hearing Sessions that consider site-specific matters.

Question 9 – Is Policy SP3 justified, effective and consistent with national planning policy and Planning Practice Guidance (PPG)?

28. The urban-focus approach to development (i.e. focusing development at Shrewsbury) will minimise reliance on the private car and maximise trips by sustainable modes of transport, and consequently reduce carbon emissions. It is therefore consistent with paragraph 105 of the Framework and paragraph ref. ID: 6-003-20140612 of the PPG.

Question 14 – Is Policy SP7 positively prepared, justified, effective and consistent with national policy? How have the residential guidelines been derived? Do these policies duplicate other parts of policies?

29. Criterion 3 of Policy SP7 (Managing Housing Development), seems to be consistent with the Framework as it does not appear to set a ceiling for new residential development. However, if it were to do this it would conflict with paragraph 60 of the Framework and could result in the Plan failing to meet its housing needs *as a minimum* (paragraph 35a).

Question 17 – Is Policy SP12 justified, effective and consistent with national policy?

30. Our concern associated with the soundness of Policy SP12 (Shropshire Economic Growth Strategy) relates specifically to point 4a. of the Shropshire Economic Growth Strategy (EV044) – this being the delivery of economic development proposed to deliver Policy SP13. In view of this, please refer to our response to Question 18 below and our representations to Policy SP2 (Strategic Approach) and SP13 (Delivering Sustainable Economic Growth and Enterprise).

Question 18 – Is Policy SP13 justified effective and consistent with national policy? Should figure SP13.1 text be included within Policy SP13?

31. No.

32. As set out in detail within our representations to Policies SP13 and Policy SP2, the economic evidence base (namely the Economic Development Needs Assessment (EV043)) which underpins Policy SP13, and the wider Shropshire Economic Growth Strategy (Policy SP12), unequivocally concludes that the level of planned employment land delivery over the 2016 and 2038 period (300 ha.) is neither justified nor effective.

33. Indeed, the Economic Development Needs Assessment (EV043) confirms that the level of planned employment land growth over the Plan period (300 ha.) would result in a significant housing and job growth misalignment that is likely to result in unsustainable commuting patterns into Shropshire, as there will be insufficient homes within the district to meet the needs of the increased and diverse workforce:

“If the housing requirement is at, or below, the 1,400 dpa under labour supply scenario 4 then this could have repercussions on the employment land target, which may have to be reduced as a consequence to ensure the two are not misaligned. It is strongly recommended that, in these circumstances, the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement.”

Economic Development Needs Assessment (EV043), paragraph 9.10

34. To meet economic projections (projections prepared by one of the main forecasting houses, Experian) and the regeneration objectives and commitments set out within the Marshes LEP Strategic Economic Plan (EV109), the Council’s evidence base concludes that the level of planned employment land growth over the Plan period should be circa. 7.6 ha. per annum (166 ha. over the Plan period). However, even at this level of employment land growth, the Council’s evidence base strongly recommended that further housing modelling should be prepared, as a housing requirement greater than 1,400 dpa would still be necessary to appropriately align jobs and housing. Of fundamental concern, the Council has failed to do this additional housing modelling.

35. In view of this, the level of employment land proposed within Policy SP13 (300 ha.) is not effective as this quantum of employment land cannot and will not be deliverable over the Plan period due to a lack of available local workforce, or will result in significant and unsustainable in-commuting that would be inconsistent with national policy. However, if the Plan was to deliver a greater quantum of housing we could, in principle, support the higher economic growth figure.
36. By reference to the Council’s Employment Strategy Topic Paper (GC4n), it appears that the 300 ha. of employment land growth over the Plan period is based on the Economic Development Needs Assessment Regeneration Scenario with a Black Country allowance (78.57 ha net). However, as opposed to applying the widely accepted plot ratio of 40% (as applied within the Economic Development Needs Assessment) the Council now applies a meaningfully lower ratio of 26%. The Council cites Shropshire monitoring data between the 2006 and 2020 period for the lower 26% ratio.
37. However, as summarised within the table below, analysis of employment land delivered over the 2007 to 2020 period, indicates that a significant proportion (almost 70%) related to general industrial or storage and distribution space, which typically has a much lower plot ratio than office space. Office development has much greater scope for increasing the development capacity of the land by building upwards.
38. However, conversely (and as summarised below), the projected employment land required under the Council’s Regeneration Scenario expects a significant need for office space and little need, if any, for general industrial or storage and distribution over the period to 2039:

Employment Land Type	Shrewsbury AMR 2007-2020	Regeneration Scenario (2016-2039)
Office	17%	41%
Light Industrial	15%	74%
General Industrial	34%	-15%
Storage and Distribution	35%	0%

Source: Shropshire AMR March 2020, Shropshire Economic Development Needs Assessment and Nexus Planning analysis.

39. In view of this, the application of the Council’s trend-based plot ratio analysis is flawed. The 40% ratio applied within the Council’s Economic Development Needs Assessment is demonstrably the most

justified and effective ratio to apply, with the implication of using a lower plot ratio being the creation of an imbalance between jobs generated and housing provided within the Plan.

40. Notwithstanding the points made in response to Question 5 within this Matter (and associated answers to other questions), criterion 7 of Policy SP13 is necessary to reflect criterion b of paragraph 122 of the Framework, allowing decision makers to act flexibly in determining planning application on allocated employment land should the demand for this land use change during the Plan period.

Nexus Planning

Reading

5th Floor Thames Tower
Station Road
Reading RG1 1LX

T: 0118 214 9340

nexusplanning.co.uk