

Hearing Statement for the Shropshire Council Local Plan Examination

Matter 3- Development Strategy (Policies SP1 – SP15)

Statement on Behalf of the Stanmore Consortium Ref: A0497

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor Unique Part A Ref:	A0497
Matter	3
Relevant Question No.s	2, 3, 4, 9, 13, 16, 17, 18, 19, 20

Stage 1 Hearing Statement

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1. Introduction

- 1.1. This Hearing Statement has been prepared by JLL and DTA 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.
- 1.2. In 2017 Shropshire Council approached TSC 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 have continued 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. Response to the Inspectors Questions in Relation to Matter 3- Development Strategy (Policies SP1 – SP15)

Question 2

Does Policy SP1 include criteria to assess development proposals against? Does it replicate other policies in the Local Plan? Is it necessary and effective?

- 2.1. Whilst TSC are generally supportive of Policy SP1, it is considered that the policy should explicitly recognise the urban focus within the Plan and the need to direct the majority of new development towards settlements with the most extensive range of services. It should also acknowledge the need to support the aspirations within the Shropshire Economic Growth Strategy and support the protection and growth of existing businesses in the County.

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?

- 2.2. TSC consider it unclear how the spatial strategy and distribution of growth in Policy SP2 will meet the Council's growth aspirations. TSC consider that the statement in Policy SP2 that 'This local plan ensures that sufficient land in the right locations is available to achieve these growth aspiration...' has not followed through into site allocations.
- 2.3. For example, in the case of Bridgnorth, there appears to be a notable mis-match between the broad scale of employment land proposed and the number of new dwellings. S3.1. Development Strategy: Bridgnorth Principal Centre envisages that Bridgnorth will deliver around 1,800 homes and 49ha of employment land up to 2038 of the overall Strategy of 30,800 homes and 300 ha of employment land. Across the county, the spatial strategy proposes around 103 homes per hectare of employment land. However, in Bridgnorth the Area Plan only proposes around 37 homes per hectare of employment land. If the average homes to employment ratio is applied to the 49ha of employment land in Bridgnorth, then the Strategy would be expected to deliver around 5,000 homes. While this is only a high-level comparison, the significant disparity between housing and employment growth in Bridgnorth, compared to the county average, suggests that insufficient housing land will be available to achieve the economic growth aspirations.
- 2.4. In addition, to achieve this growth sustainably, development in Bridgnorth needs to come forward alongside appropriate enhancement in infrastructure, particularly as growth in new housing and new economic development will influence how travel patterns develop and how the transport system can be adapted to manage them. This requires an integrated approach to achieve a sustainable pattern of growth. Ideally, the objectives would be clearly established from the outset against which, growth strategies could be tested. In our opinion this has not been carried out by the Council.

- 2.5. Continuing to take Bridgnorth as an example, the WSP Review of Potential Strategic Sites for Bridgnorth (EV013.21), which the Council has relied on within its evidence base, takes a materially different approach to transport planning than the policy objectives within the Local Plan. This not only highlights methodological issues in the application of the Council's strategy but that the emerging development strategy does not inherently align with those policies. Moreover, the Bridgnorth examples suggests that this is not solely down to the execution of an individual study but the Council's brief for the Report fails to set policy led objectives; and failed to frame a methodological approach or measurement criteria which related to the relevant Policies. Ultimately the policy can only be sound if it is capable of being applied. It is unclear to TSC whether this flawed approach has been equally applied in the evaluation of development in settlements across Shropshire. If so, this is a failure of the Policy. Alternatively, if this approach has only been applied in Bridgnorth, it illustrates an inconsistent and hence unsound approach; but also accentuates the inappropriateness of the specific findings that have arisen in Bridgnorth which must be addressed at the Stage 2 hearings.
- 2.6. The Council in considering the spatial strategy and broad distribution in Policy SP2 should recognise the renewed focus on the need for communities to be able to meet a greater proportion of their needs, for places to be better oriented to people and for mobility to be planned at a level where people can conveniently and genuinely walk and cycle. The Council has failed to adequately factor in the relationship between employment and residential land uses and the associated provision of infrastructure and transport services.
- 2.7. For example, in Bridgnorth identifying strategic growth to the west of the Town at Tasley rather than the east will result in significantly more traffic crossing the town to access established employment areas. Existing employment to the east of the river accounts for 80% of local jobs. The equivalent population proportion is only 35%. The contrary outcome represents the pattern to the west. Policy SP2 should seek to actively manage patterns of development to reduce emissions, and this should be applied in the approach to identifying sites, which has clearly not been the case. The location and juxtaposition of uses should be the starting point. Re-balancing the workplace/households pattern is a fundamental means of positively meeting the expectations of Policy SP2. The appraisal methodology of the Council for this Plan fails to demonstrably consider this aspect of spatial strategy appropriately.
- 2.8. TSC considers the policy is unsound, not effective and may lead to under delivery of housing and employment land. SP2 Part 2 commits to keep the availability of land under review to ensure a continuous supply of suitable sites is available and it is imperative that land in the right location is identified. However, it does not propose any recourse in the event allocated land is later found not to be available. As such, it is unsound as it is not effective.
- 2.9. Policy SP2 Part 2 needs to set out or draw attention to another policy as to how it is flexible and adaptable if a major site is not deliverable. Policy SP7 Managing Housing Development adds some flexibility to allow housing if a shortfall in the Plans residential development guideline for a settlement arises, but this could lead to ad-hoc site approvals rather than planned development.
- 2.10. TSC have raised serious concerns about the delivery of the allocation of 1,050 houses at Tasley Garden Village in Bridgnorth under Policy S3. It is considered that an allocation to the east at

Stanmore Garden Village is more likely to deliver a cohesive development of housing, employment (existing and future) and community infrastructure.

- 2.11. The modification required Policy SP2 Part 2 needs to be flexible and adaptable in the event land allocated is not available and it should specify a specific course of action to rectify such a situation. Recourse should be a review of the Local Plan or a planning application in accordance with SP7.

Question 4:

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

- 2.12. TSC consider that providing the distribution of the broad scale of development across the various urban and rural locations provides the starting point to understanding the distribution of development and infrastructure across the county. Currently, the information is fragmented and providing the information within Policy SP2 would give greater certainty and clarity to the wider distribution of development.

Question 9

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

- 2.13. TSC considers that Policy SP3 is neither effective nor consistent with national planning policy and should recognise the contribution of land use planning to support the transition to a zero-carbon economy. The level of change required necessitates an integrated approach to achieve a sustainable pattern of growth. Critically, the objectives should be clearly established at the outset against which growth strategies could be tested. This has not been adequately carried out by the Council.
- 2.14. Directing development to the most sustainable settlements is a start, but it should be recognised that within those settlements, some locations and developments can contribute more than others to transition to zero-carbon. For example, certain locations within those settlements will reduce commuting. In the case of Bridgnorth, as commuting is generally to the east of the settlement to employment locations such as Stanmore Business Park, Faraday Business Park, the West Midlands conurbation to the east and Telford to the north, a development on the east side of the settlement will significantly reduce the miles travelled by car compared to development on the south or west. Furthermore, by locating jobs next to housing, the need to travel is reduced.
- 2.15. In the case of Bridgnorth, it is estimated that by allocating development at Tasley Garden Village rather than Stanmore Garden Community, this will result in four times more traffic routing north and east. External commuting to the north and east (35%) compares with commuting to the west (9%). The significance for growth is that, to the west, significantly more traffic will need to cross town compared with a development to the east. This is a particular issue as it will exacerbate the existing bottle necks, and diminish the wider functions of these streets, the environment and amenity, including highway safety for all users and air quality, and

the ability to encourage active travel. It is also worth noting that Severn Bridge within the town centre, is a Grade II listed¹, which precludes any significant widening.

Question 10

Is Policy SP4 necessary as it rehearses national planning policy, contrary to the advice in PPG (Paragraph: 036 Reference ID: 61-036-20190723)?

- 2.16. TSC support Policy SP4 and have no further specific comments to make on this issue.

Question 11:

The Framework at paragraph 28 advises that ‘non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods, or types of development. This can include...the provision of infrastructure and community facilities at a local level...establishing design principles...’ Are Policies SP5 and SP6 strategic policies or development management policies?

- 2.17. TSC support the principles set out in policies SP5 and SP6, however these are development management policies rather than strategic policies.

Question 12:

What is the status of the West Midlands Design Charter and does Policy SP5 align with its principles? Is there any scope for tension between Policy SP5 and Policy DP24? Is Policy SP5 justified, effective and consistent with national policy?

- 2.18. TSC support the principles of policy SP5 and have no specific comments to make on this issue.

Question 13:

How have the health impacts of the Local Plan been assessed and addressed? Is Policy SP6 justified, effective and consistent with national policy?

- 2.19. The Policy should recognise that the NPPF sets out the government’s planning policies and how they should be applied. It requires (Paragraph 92) planning policies to “enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs. It also seeks to promote development where there is social interaction, including opportunities for meetings between people for example through genuine mixed-use developments, strong neighbourhood centres, street layouts that allow for pedestrian and cycle connections within and between neighbourhoods.

¹ List UID: 1053177

Question 16

Is the approach to development in the countryside, set out in Policy SP10, justified and effective and consistent with national planning policy? Should it be more flexible and less restrictive? Is the policy overly long and complicated and does some of it duplicate other policies? Would this policy be more effective as several shorter, targeted development management policies?

- 2.20. TSC support the general approach to controlling development in the open countryside and directing development to sustainable locations. However, it is considered that the Policy is overly complicated and more appropriate as a development management policy.

Question 17

Is Policy SP12 justified effective and consistent with national policy?

- 2.21. TSC support Policy SP12, particularly with regard to Part 5, which recognises the important inter-relationship between economic and housing development and indicates the delivery of economic development will be supported by housing development of the right type in the right location. The economic growth of the County within the identified corridors is fundamental to the success of the Economic Growth Strategy for Shropshire and to the Local Plan objective to prioritise in strategic locations and growth zones.
- 2.22. A fundamental of the residential policies is the development of strategic residential sites, including Garden Villages. By definition these include being located in immediate proximity to employment areas. Furthermore, the sustainability and environmental policies of the Council, together with their associated targets to reduce pollution require minimising the number of vehicle movements to and from employment locations. Existing employment to the east of the river accounts for 80% of local jobs. The equivalent population proportion is only 35%. Re-balancing the workplace/households pattern is a fundamental means of positively meeting the expectations of Policy SP12 and the localisation of travel demand within the community. As a result, the residential and commercial developments are inextricably linked and should be recognised in Policy SP12.

Question 18

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

- 2.23. For the reasons set out below, TSC consider that Council's approach makes the Plan unsound as the policies are not effective and delivery of employment sites may be hindered as a result.
- 2.24. The employment policies in SP12, SP13 and SP14 together, are overcomplicated, repetitive, and likely to deter employment development as there are so many strands of policy to navigate for a development to be supported. The policies together need clarity on what they relate to, for example, they conflate a strategy to select sites to allocate, guiding development on allocated sites and consideration of sites not allocated. A simplified approach would be welcomed allowing employment growth to flourish and meet the growth vision in the Shropshire Economic Growth Strategy 2017 -2038.

- 2.25. The Strategy should set out the key issues for the Principal Centres and Key Centres in relation to delivering sustainable economic growth. Simplifying Policy SP13 will encourage, allow, and direct development to meet the identified need. There should be recognition within the policy that development falling within new Use Class E(g) are suitable in particular uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial on site already.
- 2.26. TSC considers that as currently worded, Policy SP13 is not effective as it is overly complicated and as set out below, it is internally inconsistent and inconsistent with Policy SP12 and would hinder the delivery of the economic development strategy. The Policy should be simplified and corrected as set out below.
- 2.27. Part 3 d. of the policy largely repeats national policy and is therefore unnecessary and should be deleted as these issues are already covered by other policies and guidance. If direction to these parts of the NPPF is considered useful, then the text could be included within explanatory text to provide guidance.
- 2.28. Part 5 of the Policy simply directs the reader to other policies within the Local Plan. As development should be assessed against these in any event, there is no requirement to assess them again to comply with Policy SP13. Therefore, Part 5 should be deleted. If direction to these policies is considered useful, then the text could be included within explanatory text as guidance.
- 2.29. Part 6 of the policy relates only to Class B uses and is inconsistent with the remainder of Policy SP13 as well as SP12, which relate to wider economic development uses. As currently worded, Part 6 excludes any windfall economic development, save for industrial and storage and distribution uses and would hinder the delivery of economic growth strategy set out in SP12.
- 2.30. To correct this inconsistency, Part 6 of the policy should refer to “employment generating uses, as defined in Part 2 of the policy”.
- 2.31. As with Part 6, Part 7 of the policy excludes all economic development save for industrial and storage and distribution uses. To correct this inconsistency, Part 6 of the policy should refer to “employment generating uses, as defined in Part 2 of the policy”.

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?

- 2.32. TSC support the principle of the Policy SP14 and the inclusion of Bridgnorth being a recognised location within the eastern belt strategic corridor to attract inward investment and support growth. The identification of the corridors reflects the Shropshire Economic Growth Strategy and the objective to grow the local economy in locations where there are various sectors and clusters that are performing well with successful companies, supporting the growth of these sectors, clusters and companies underpinning the economic strategy. As an example, Stanmore is recognised as a key location for engineering and advanced manufacturing, allowing for its expansion will make a significant contribution to achieving the economic

growth vision. The role of major employers in the County should also be recognised, including the two major firms in Bridgnorth: Grainger and Worrall and Bridgnorth Aluminium. Policy SP14 should support established businesses by seeking their protection and facilitating their growth.

Question 20

What is the national planning policy basis for Whole Estate Plans (Policy SP15)? What will be the process for endorsement and what will be their purpose? Should SP15 be a non-strategic policy?

- 2.33. TSC is supportive of the aim of the policy and the benefits a Council endorsed Whole Estate Plan (WEP) can have for the future of those living and working within the rural areas of Shropshire.
- 2.34. However, there is some concern over how the requirement for public consultation is addressed within the policy and explanatory text. TSC supports the need for public consultation on WEPs, without which, the degree of weight they could attract in the planning process would be limited.
- 2.35. It is considered that as it stands, criterion c) of Policy SP15 is open to interpretation as to what “meaningful public consultation” means and no guidance is provided within the explanatory text.
- 2.36. TSC believe that for the policy to be effective, the WEPs should be subject to a degree of public consultation and endorsement by the Council that would allow them to carry material weight in the decision-making process. It is the view of TSC that to deliver this level of endorsement, WEPs should be subject to a period of public consultation on the draft Plan and be submitted to the Council, for endorsement.
- 2.37. Given the above, the policy should be amended, and further guidance provided within the explanatory text.

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