

Evidence on Employment Land Site Allocations

**To accompany the Cleobury Mortimer
Neighbourhood Development Plan 2020 – 2038**

Submission draft

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Executive Summary

This document seeks to meet the employment land requirement for Cleobury Mortimer identified by Shropshire Council for 1.3 hectares of employment land for the plan period. The assessment revealed that the preferred site is at land south of Tenbury Road.

Introduction

1. The Planning System should be genuinely plan led and provides a framework for addressing housing needs and other economic, social and environmental priorities.¹ The Development Plan must include strategic policies to address each local planning authority's (LPA's) priorities for the development and use of land in its area.²
2. A draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan.³
3. Shropshire Council is as reviewed of available development land and has consulted widely upon its Shropshire Council Strategic Land Availability Assessment. In the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (December 2020), the Local Planning authority indicated that in the Cleobury Mortimer settlement, the Neighbourhood Plan would be expected to accommodate 1.3 ha of employment land in the period up to 2038.
4. The Cleobury Mortimer Neighbourhood Development Plan (CMNDP) is being prepared in parallel with the emerging Local Plan and is the vehicle for economic development land allocation.
5. This document sets out the Town Council's case for allocating land relying first upon evidence provided by the LPA and then by applying local evidence and justification. **The report recommends allocation of land south of Tenbury Road, Cleobury Mortimer is allocated for B and E Class uses.**

Shropshire Council Strategic Land Availability Assessment (November 2019)

Stage 1 Assessment

6. Shropshire Council undertook its Strategic Land Availability Assessment (SLAA) in November 2018. The SLAA is a technical assessment of the suitability; availability; and achievability (including viability) of land for housing and employment development. As such, the SLAA incorporates the process formerly known as the Strategic Housing Land Availability Assessment (SHLAA).

¹ NPPF 15.

² NPPF 17.

³ Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20190509.

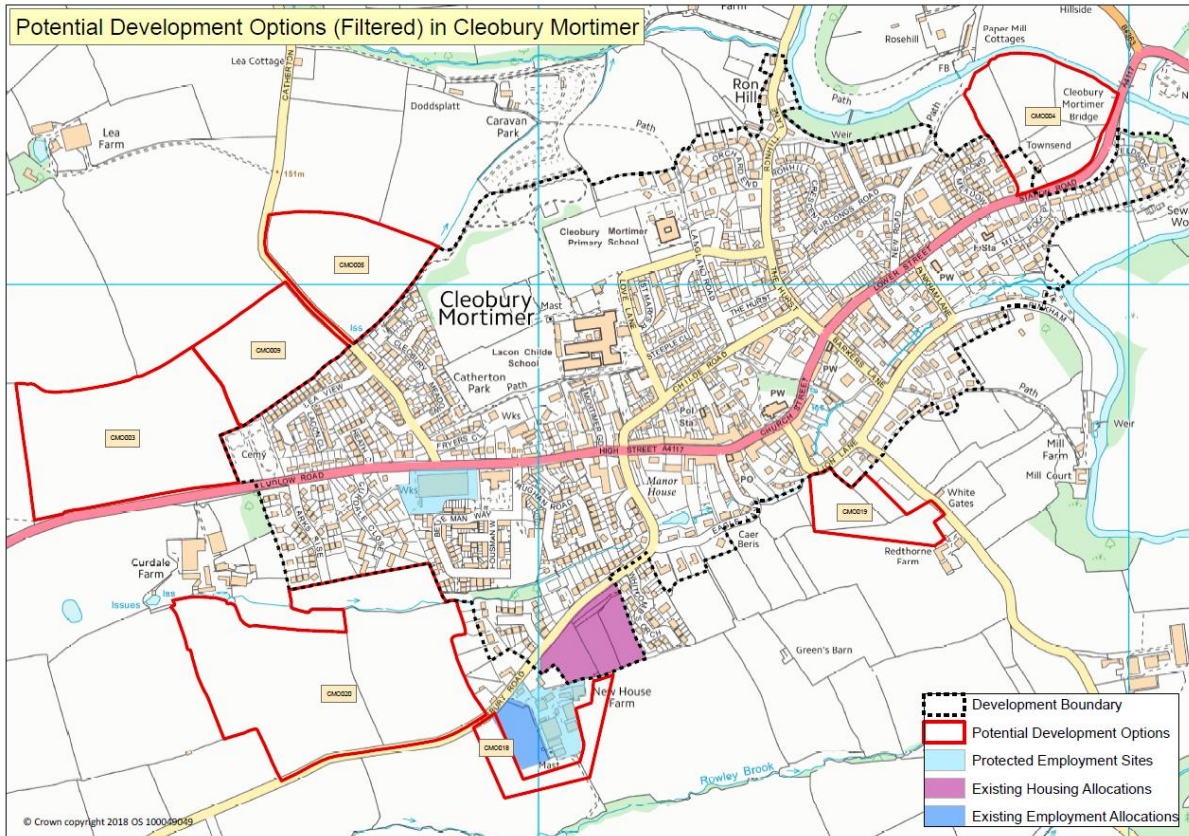
7. The SLAA represents a key component of the evidence base which will support the Shropshire Council Local Plan Review. References to the suitability of a site for open market residential development or residential development within this assessment relate to open market residential development which provides an appropriate affordable housing contribution at the relevant prevailing rate. References to the suitability of a site for employment development within this assessment relates to employment development of a use class appropriate to the site and its setting. It was based on a call for sites in Spring 2017.
8. Development potential is the consideration of a site's capacity for various forms of development. This should be informed by current and emerging planning policy.
9. The SLAA considered the following sites in the first assessment (**Table 1**) . This first assessment concluded that all Cleobury Mortimer sites were acceptable in principle and required further consideration, with the exception of CMO017 which was rejected.

Table 1: Stage 1 site assessment, SLAA 2017

Site reference	Location	Residential conclusion overall	Employment conclusion overall
CMO002	Curdale Farm, Ludlow Road, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO003	Land off Ludlow Road (A4117), Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO004	Land to the north of Station Road, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO005	North East of Catherton Road, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO006	Land to the east of Fryers Close, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO009	Land West of Catherton Road, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO017	Rear of Manor House, Cleobury Mortimer	Rejected	Rejected
CMO018	Land South of Tenbury Road, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO019	Land to the South of Lion Lane, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment
CMO020	Land off Tenbury Road, Cleobury Mortimer	Long Term Potential - Subject to Further Detailed Assessment	Long Term Potential - Subject to Further Detailed Assessment

10. The results of the first consideration of availability, achievability and viability which informed the Local Planning Authority’s (LPA’s) conclusions whether to take sites forward for further assessment is displayed graphically in the map in **Figure 1**.

Figure 1: Potential development options in Cleobury Mortimer



Source: Shropshire Council

Local Plan Review – Preferred Sites Consultation and Site Assessments Stage 2 and Stage 3

11. As part of the preferred sites consultation, the LPA produced its “**Site Assessments: Cleobury Mortimer Place Plan Area Published November 2018**”. No preferred sites were proposed in Cleobury Mortimer, because it had been left for the NDP to allocate appropriate housing and employment land⁴.

12. The Place Plan assessment gave further consideration to the potential sites.

Stage 2 Assessment

13. A “Stage 2” Site Assessment was undertaken by the LPA using the following criteria:

Stage 2 of the site assessment process represents a detailed screen of sites. This screening exercise was informed by consideration of a site’s availability, size and whether there were obvious physical, heritage or environmental constraints present, based on the strategic assessment undertaken within the SLAA.

⁴ Shropshire Local Plan Review: Consultation on Preferred Sites, November 2018.

Specifically, in Strategic, Principal and Key Centres, sites will not proceed to Stage 2 of the site assessment process where:

1. There is uncertainty about whether the site is available for residential development.
2. The site is less than 0.5ha in size (unless there is potential for allocation as part of a wider site).
3. The strategic assessment of the site has identified a significant physical*, heritage** and/or environmental** constraint identified within the strategic assessment of sites undertaken within the SLAA.

*Significant physical constraints:

1. The majority of the site is located within flood zones 2 and/or 3.
2. The site can only be accessed through flood zones 2 and/or 3.
3. The majority of the site contains an identified open space.
4. The site can only be accessed through an identified open space.
5. The topography of the site is such that development could not occur (apply cautiously).
6. The site is separated from the built form of the settlement (unless the land separating the site from the built form is also promoted and will progress through this screening).
7. The site is landlocked/does not have a road frontage (unless another promoted site will progress through this screening and could provide the site a road frontage for this site).
8. The site is more closely associated with the built form of an alternative settlement.

**Significant environmental/heritage constraints:

1. The majority of the site has been identified as a heritage/environmental asset.

14. The Stage 2 Assessment considered residential suitability, and the results are summarised in the **Table 2**.

Table 2: Stage 2 Site Assessment (residential)

Site reference	Location	Summary conclusion
CMO002	Curdale Farm, Ludlow Road, Cleobury Mortimer	Removed from the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO003	Land off Ludlow Road (A4117), Cleobury Mortimer	Considered within the next stage of the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO004	Land to the north of Station Road, Cleobury Mortimer	Considered within the next stage of the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO005	North East of Catherton Road, Cleobury Mortimer	Considered within the next stage of the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO006	Land to the east of Fryers Close, Cleobury Mortimer	Removed from the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO009	Land West of Catherton Road, Cleobury Mortimer	Considered within the next stage of the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.

CMO017	Rear of Manor House, Cleobury Mortimer	Removed from the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO018	Land South of Tenbury Road, Cleobury Mortimer	Removed from the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO019	Land to the South of Lion Lane, Cleobury Mortimer	Considered within the next stage of the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.
CMO020	Land off Tenbury Road, Cleobury Mortimer	Considered within the next stage of the site assessment process due to conclusions reached regarding the site's availability, size and/or suitability.

Stage 3 Assessment

A "Stage 3" Assessment was undertaken by the LPA using the following criteria:

Stage 3 of the site assessment process involved a more detailed review of sites and selection of preferred site allocation. This stage was informed by:

- Assessments undertaken by Highways; Heritage; Ecology; Trees; and Public Protection Officers.
- Commissioned evidence base studies, including a Landscape and Visual Sensitivity Study; Strategic Flood Risk Assessment; and Green Belt Review.
- A Sustainability Appraisal.
- A Habitats Regulations Assessment.
- Consideration of infrastructure requirements and opportunities.
- Other strategic considerations and professional judgement.

15. The main conclusions are summarised in **Table 3**. For the ease of comparison, the summary conclusions are rated according to "red" = difficult constraint; "amber" = constraint that can be mitigated, "green = not significant constraint".

Table 3: Stage 3 Site Assessment (residential)

Site reference	Location	Development constraints	Landscape	Highways accessibility score out of 24	Ecology constraints	Heritage constraints	Tree constraints	Public protection	Sustainability Appraisal
CMO003	Land off Ludlow Road (A4117), Cleobury Mortimer		Medium	17	EclA required. Surveys for GCN (ponds within 500m), Badgers, Bats, nesting birds.			Road noise	Fair
CMO004	Land to the north of Station Road, Cleobury Mortimer		High	20	Site lies entirely within Env. Network corridor. CS17 Environmental Networks applies. No or reduced number of dwellings possible. Suggest seek landscape advice. Lies within the flood plain. EclA required. Surveys for Dormice, Badgers, Bats, nesting birds, plants (unimproved grassland and other potential priority habitats need botanical survey to assess impacts), reptiles, otters, water voles, Crayfish.	Possible effects on setting of Castle Toot scheduled monument (NHLE ref. 1012868). Possible windmill site (HER PRN 15795) and archaeological earthworks on site, and it therefore holds archaeological interest.	Relatively small scale field pattern would effectively be destroyed if whole site is developed. Belts of mature trees and hedges around and within site.	Road noise	Fair
CMO005	North East of Catherton Road, Cleobury Mortimer		Medium and high	15	EclA required. Surveys for GCN (ponds within 500m) Badgers, Bats, nesting birds.		trees and hedges to site boundaries		Good
CMO009	Land West of Catherton Road, Cleobury Mortimer	24% of site in 1000 year flood zone	Medium	15	EclA required. Surveys for GCN (ponds within 500m) Badgers, Bats, nesting birds.		trees and hedges to site boundaries		Good

**CMNDP Site Allocation Evidence
Submission Draft
November 2022**

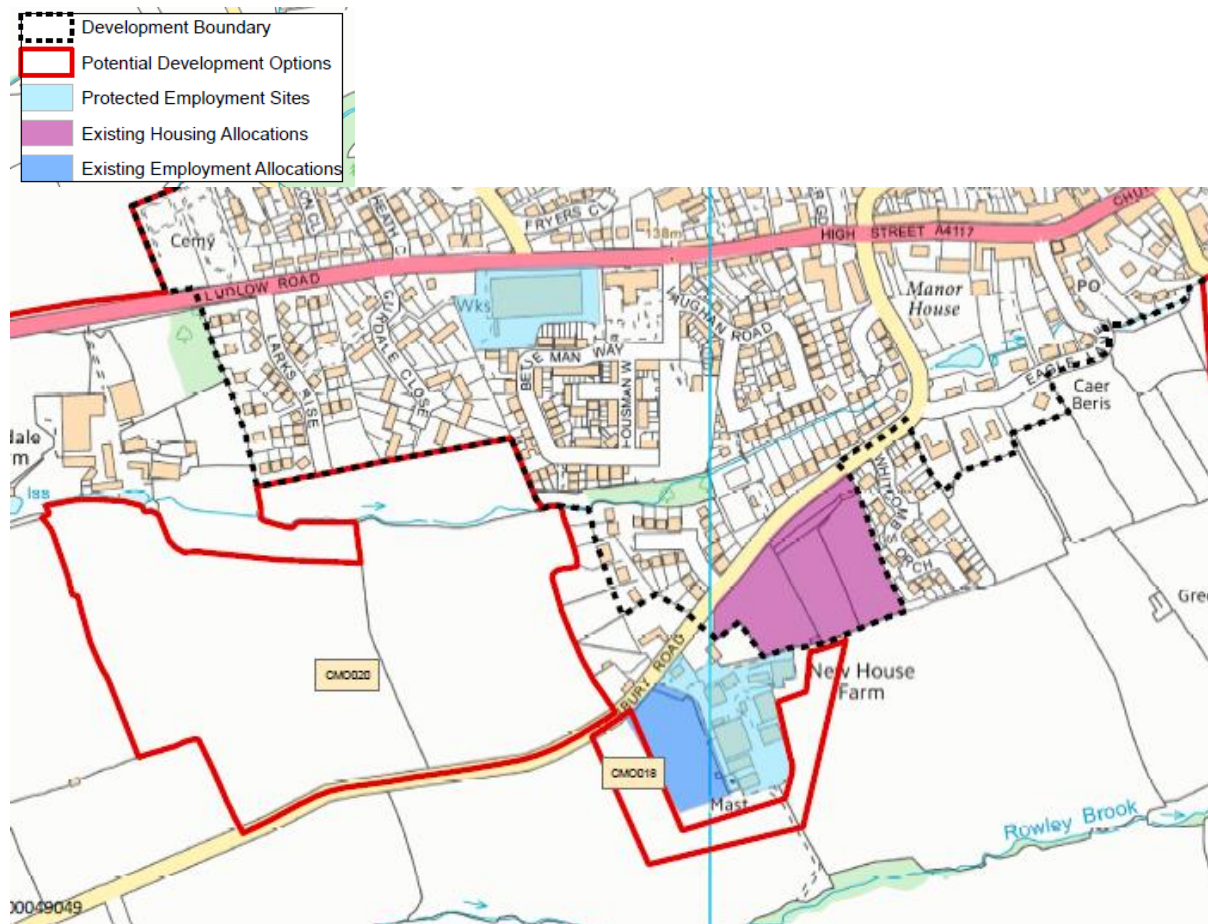
CMO019	Land to the South of Lion Lane, Cleobury Mortimer		High	19	EclA required. Surveys for GCN (ponds within 500m), plants (unimproved grassland and other potential priority habitats need botanical survey to assess impacts), Badgers, Bats, nesting birds, reptiles, possibly invertebrates.	Site located in a highly prominent position on the boundary, and within the setting of, the Cleobury Mortimer Conservation Area. Also probable effects on the setting of the listed buildings within the Conservation Area, including Grade I Listed Church of St Mary. We advise that the site is not allocated			Good
CMO020	Land off Tenbury Road, Cleobury Mortimer		Medium	19	EclA required. Surveys for GCN (ponds within 500m), plants (unimproved grassland and other potential priority habitats need botanical survey to assess impacts), Badgers, Bats, nesting birds, reptiles, otter, water vole, crayfish. Environmental Network crosses the northern part of the site along the water course so CS17 Environmental Networks applies.	Possible effects on settings of non-designated heritage assets (farm house and traditional farm buildings) at Curdale Farm. No known archaeological interest but site is of a large size, so may have some archaeological potential			Poor

16. The Stage 3 Assessment left several assessments for the Neighbourhood Plan to undertake:
- Known Infrastructure Requirements to make Development Suitable in Planning Terms
 - Known Infrastructure Opportunities
 - Potential for Windfall
 - Potential for Allocation
 - Recommendation Reasoning
 - If proposed for Allocation, Potential Capacity
 - If proposed for Allocation Design Requirements

Employment allocation

17. Cleobury Mortimer's main B and E Class business area is located off Tenbury Road. Site CMO018 surrounds the existing employment area to the west, south and east.. Though this site was rejected in Stage 2 for consideration as a residential site, it remains suitable as an employment site.
18. CMO018 is located on land between the existing and allocated employment land and countryside. It abuts the existing housing allocation on Tenbury Road at its north eastern side, but the adjacent area is relatively narrow and is less than the current industrial estate's frontage between it and housing. This is illustrated in **Figure 2** below. The site will also have a short frontage onto Tenbury Road.
19. These constraints can be overcome by introduction of suitable mitigation, depending upon the future developments proposed. Mitigation might include acoustic fencing, dust suppression, odour control (with negative pressure buildings where necessary), conditions on lighting, hours of working, landscape treatments and on-site traffic management. None of these mitigating requirements are unusual in an industrial area and should therefore be considered likely to be viable in any proposed scheme on this site.

Figure 2: CMO018 and its relationship to housing land (map from original Strategic Land Availability Assessment)



20. Though there are in theory other sites in the settlement that could accommodate B and E Class uses, the expansion of the existing employment area would cause less disruption and have fewer site development costs than other greenfield sites in the town.
21. During consultation, the possibility of locating additional employment activities was also considered across the town. There was considerable support to locate new employment land at CMO018 (around 60%) and less support for CMO003 (25%). There was little support for other potential employment sites. In addition, upon discussions with businesses in the existing employment area, it was considered that this site was preferable to them.
22. The site promoted in the SLAA is 1 ha in size but can be extended to accommodate the requirement for 1.3 ha. employment land.
23. Part of the site originally proposed as CMO018 is steeply sloping land. The final allocation is adjusted with the landowner's agreement to allocate the more level available land.
24. SAMDev policy compliance is shown in **Table 3**. Emerging Local Plan policy is shown in **Table 4**.
25. The land is available, deliverable and suitable and it is therefore recommended for allocation, shown in **Figure 3**.

Table 3: Implications of SAMDev on employment land allocations Tenbury Road

SAMDev policy	CMO018
<p>MD1: Scale and Distribution of Development</p> <p>MD1,3: Neighbourhood plans will be formally considered as part of the Local Plan Review.</p>	<p>This site is being proposed as an allocation in the Cleobury Mortimer Neighbourhood Plan for development of 1-1.3 ha. of employment land with associated infrastructure.</p>
<p>MD2: Sustainable Design</p> <p>MD2,1: respond to local design aspirations</p> <p>MD2,2: respond to the way existing development functions, reflecting local characteristics</p> <p>MD2,7: good standards of sustainable design and construction</p>	<p>New development should be of a good standard to attract new and local businesses and should seek to add to the overall improvement of the industrial area.</p>
<p>MD4: Managing Employment Development</p> <p>MD4,1: employment will be delivered on ALLOCATED sites</p>	<p>The site is allocated to provide an additional 1-1.3 ha. of employment land to the existing allocated employment site.</p>

Table 4: Implications Emerging Local Plan on employment land allocations Tenbury Road

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 (December 2020)	CMO018
<p>SP1: The Shropshire Test</p>	<p>This proposal will provide local employment opportunities to support the community and a manner that meets and improves upon current commercial development standards.</p>
<p>SP2: Strategic Approach</p>	<p>This Key Centre will accommodate new employment development supported by provision of supporting infrastructure.</p>
<p>SP3: Climate Change</p>	<p>This allocation will provide local jobs thus reducing the need to travel to work by car, or over long distances to other employment locations. Small scale energy generation will be possible on this site.</p>

SP3: Sustainable Development	Provision for jobs and economic activity on this site will enhance the sustainability of Cleobury Mortimer overall.
SP12: Shropshire Economic Growth Strategy	This allocation contributes to the delivery of this strategy.
SP13: Delivering Sustainable Economic Growth and Enterprise.	This allocation meets locally identified need for additional commercial/employment land.
DP11.Minimising Carbon Emissions	<p>Commercial development of 1,000m² or more floorspace or with a gross site area of 1ha or more will achieve the BREEAM Excellent rating or equivalent standard within an alternative assessment endorsed by Shropshire Council.</p> <p>Where changes to existing buildings, including extensions and alterations, are being undertaken, maximising opportunities to increase fabric energy efficiency, reduce carbon emissions and integrate on-site renewable energy technologies.</p>
DP12: The Natural Environment	All development will deliver at least a 10% biodiversity net gain.
DP18: Pollution and Public Amenity	Development should take account of the requirements of DP18 during construction and operation in order to minimise pollution risks.
DP20: Water Efficiency	Commercial development will be expected to reach 'Good' BREEAM status or equivalent status within an alternative assessment endorsed by Shropshire Council, for water efficiency as a minimum, unless it can be demonstrated that this would make the development unviable.
DP22: Sustainable Drainage Systems	Where necessary, sustainable urban drainage systems should use natural water management techniques to manage all surface water risks.
DP26: Strategic, Renewable and Low Carbon Infrastructure	Proposals for renewable and low carbon infrastructure will be supported where these do not cause harm to amenity and character.

DP28: Communications and Transport	Active travel will be supported by provision of improved footways on Tenbury Road for the full extent of the site frontage (including the existing allocation)
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Strategic Environmental Assessment (SEA)

26. On 5 October 2020, the Steering Group received an Opinion from the Local Planning Authority in a letter (no date) which concludes that the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 which determine whether a Strategic Environmental Assessment (SEA) is required have been met in the Cleobury Mortimer Place Plan Area Site Assessments Published: August 2020.
27. As part of the Regulation 14 consultation in 2020, the Steering Group requested a screening opinion from the Local Planning Authority whether Strategic Environmental Assessment of the CMNDP will be required. Because the CMNDP site allocation methodology was based upon that developed by the Local Planning Authority, the planning authority gave the opinion that SEA was required. The response letter is copied in Appendix 2 of the Site Allocations evidence for the CMNDP.
28. The Steering Group commissioned AECOM through Locality to undertake the screening process and to produce the final Strategic Environmental Assessment (SEA) Environmental Report (April 2022). The SEA report is attached as a separate document.
29. The report concluded:
 - 6.65 *Overall, a range of effects have been identified through the assessment against the different SEA themes. Most of the identified effects are common to both options and only marginal differences between the options are identified in relation to the SEA themes of landscape and transportation. Whilst minor long-term negative effects are anticipated in relation to these themes for both options, Option E-A is recognised for its greater potential to integrate with the existing and established employment area off Tenbury Road when compared to Option E-B. Furthermore, Option E-A is better located to facilitate new and improved footpath connections in both new development and the existing employment area.*
 - 6.66 *Significant positive effects are anticipated under both options by way of their potential to deliver in full against the identified need for employment land. Increasing local access to employment opportunities is also recognised for community benefits, including reducing deprivation and improving health outcomes in this respect. Minor long-term positive effects are anticipated in relation to health and wellbeing as a result.*
 - 6.67 *Minor negative effects are anticipated under both options in relation to land, soil, and water resources, given the inevitable loss of greenfield, and likely high-quality agricultural land resources at either site.*
 - 6.68 *Broadly neutral effects are anticipated under both options in relation the SEA themes of biodiversity, climate change and historic environment. This reflects the likelihood that development will not lead to any significant deviation from the baseline.*