

Ref: GA/AM/01518/L0012am

11th June 2024

Shropshire Council
c/o Kerry Trueman
Programme Officer Solutions Limited
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Dear Sirs,

Response on behalf of Manor Oak Homes to Document GC45 Updated Housing and Employment Topic Paper
Respondent Reference ID: A0379

I write to you on behalf of my client Manor Oak Homes and in respect of the additional information provided by the Council towards the ongoing examination of the draft Shropshire Local Plan. Specifically, we wish to provide brief remarks in respect of **Document GC45**, the Updated Housing and Employment Topic Paper that was produced under the express instruction of the Inspectors.

Manor Oak Homes is the promoter of Site Reference SHR197VAR at Shrewsbury which has consistently been made available for employment uses throughout the local plan process. Accordingly, our client has responded at each consultation stage of the emerging Local Plan Review and participated in the examination hearings to date with a specific focus on the provision of employment land, both at Shrewsbury and more generally. Our comments in respect of Document GC45 are therefore specifically in response to the Council's proposals to identify a need for, and then deliver, a sufficient supply of commercial sites across the County.

It is worth adding that this submission also follows a substantial level of engagement with the Council, including a series of meetings with officers, which have taken place to coincide with each consultation stage with a pre-application enquiry in respect of our client's land taking place in parallel with the examination. Accordingly, we have an up-to-date and comprehensive understanding of the economic development needs of Shrewsbury in particular.

It is understood that the Council has produced an updated Housing and Employment Topic Paper to overcome

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the confusion of the Inspectors in respect of how the plan requirement for homes and employment land has been derived and how the Council have sought to test the two distinct factors of the plan area's own requirements and the contribution towards the unmet needs of the Black Country separately. In producing this paper, it is noted that the Council has taken the opportunity to update the overall targets for each in the round, presenting both new housing and employment land figures for the plan period – both higher.

The central point that has been put to the examination by our client to date, and one which appears to be strengthened by the updated analysis included in the topic paper, is that the Council is currently doing nowhere near enough to meet the needs identified by the plan. This is reflective of the needs for Shropshire itself before the application of the 30ha uplift to help satisfy the unmet needs of the Black Country. The need for employment land has increased whilst the position in respect of supply, the future of key site SHR166 in particular, is even more uncertain.

A key issue identified by the Inspectors is that the Shropshire requirement plus uplift was being considered as a single aggregated figure which led to confusion in the plan's economic strategy and the subsequent way each employment land figure was tested by the Sustainability Appraisal (SA). Accordingly, the Update Topic Paper, aided by the revised SA, helpfully recasts the assessment of employment land need and delivery to ensure the principal assessment is of Shropshire's own economic strategy, with the 30ha proposed to meet the needs of the Black Country (a figure agreed through the Duty to Cooperate) added after this event.

This exercise, and an effective ring-fencing of the Black Country supply, is coupled with a realisation that the Plan must do more to meet the basic needs of Shropshire. Indeed, it is welcome that upon testing the scenarios the SA concludes that it can do so in a sustainable manner - accordingly, the Update Topic Paper concludes a reversion of the strategy back to the 'High Growth' scenario last considered by the Council at the 'Scale and Distribution of Growth and Development' stage of the Regulation 18 consultation in 2017. Resultantly there is to be an increase in the Plan's employment land requirement from the 300ha set out at current draft Policy SP13 (considered to be 270ha for Shropshire plus 30ha to contribute towards the needs of the Black Country) to 320ha (290ha plus 30ha), so an additional need for Shropshire of 20ha. **Having reviewed both the Topic Paper's working along with the accompanying update to the SA we support this uplift and the disaggregation of the Shropshire and Black Country requirements.**

This additional 20ha requirement does, however, pose problems for a plan that is already struggling to robustly meet its current employment land requirements. Whilst it is noted that this consultation is not seeking views on the Local Plan more broadly, we urge the Inspector to explore several issues in greater detail as part of any forthcoming hearing sessions:

The Council's employment land strategy – allocations: As described in detail in our client's submission towards the Regulation 19 consultation and then again in summary as part of the Matter 4 Hearing Statement the Council's employment land strategy set against even the lower 270ha for Shropshire is deficient. Within this figure it is identified in the draft Local Plan that 50ha of this land would be required at Shrewsbury (we would anticipate this to now increase with the addition of much of the additional 20ha of land required due to the strategic importance of the town).

However, the Shrewsbury Place Plan strategy only seeks to allocate a gross supply of 50ha of employment land across two sites, described by paragraph 16.153 of the Update Topic Paper as comprising "*a minimum of 5ha on the land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161) sustainable urban extension; and around 45ha on a dedicated employment allocation to the west of the A49, Shrewsbury (SHR166)*". Both of which are stricken with constraints to delivery. The former will only proceed as part of a phased approach to the overall urban extension, so unlikely until much later in the plan period. Then site SHR166 is now known to almost entirely comprise a Scheduled Ancient Monument which will surely result in its deletion

from the plan. On this point paragraph 16.154 of the Update Topic Paper goes on to state:

"SHR166 is intended to perform a strategic employment role, being capable of delivering a range of employment uses, including B2 and B8 uses. Flexibility to deliver the whole range of employment uses on this site has however subsequently been impacted by heritage considerations raised by Historic England and the designation of the site of a temporary Roman marching camp as a Scheduled Monument. It is acknowledged that this issue is yet to be discussed fully at the Examination and is likely to form part of the considerations for Stage 2 hearing sessions."

It is clearly a matter that the Council is seeking to avoid tackling for as long as possible. Whilst paragraphs 5.92 to 5.98 of the previous Housing and Employment Topic Paper (GC28) hinted towards there being no need to replace this allocation if deleted due to the residual supply versus need at the time (August 2023) matters have evidently moved on following the proposed review of growth scenarios and the uplift in the requirement for Shropshire with the current update removing these references.

To confirm, our client's land at Battlefield Roundabout (Site SHR197, so the whole site, and SHR197VAR) continues to be available to the Council for an employment allocation of minimum 9ha of land up to 30ha and at a location that was previously deemed appropriate for such growth by the Regulation 18 draft of the Plan.

The Council's employment land strategy – windfall sites: As covered by our client's Matter 3 Hearing Statement there is insufficient flexibility in the Council's employment land development strategy to ensure sufficient land comes forward as and when the market demands. Policy SP12 is devoid of monitoring criteria to ensure that supply is meeting needs with Policies SP13 and SP14 then lacking the sufficient level of pragmatism required to allow windfall sites to come forward where the planned pipeline of supply is faltering. A further review of our client's suggestions put forward towards the Matter 3 session is to our mind essential considering the clear issues with employment land supply that are on the horizon. Within this paper we put forward a range of suggested amendments to all three policies that we would be pleased to discuss further at any forthcoming hearing.

The area of search for sites to meet the Black Country's needs: Paragraphs 16.156 and 16.157 of the Update Topic Paper play down the adequacy of Shrewsbury as an appropriate location to meet the needs of the Black Country. Despite acknowledging that *"Shrewsbury as a strategic settlement on the M54/A5 corridor offers a potential alternative location to Shifnal to deliver a strategic site to contribute to meeting Black Country employment need"* the paper swiftly rules it out due to its lack of proximity to the Black Country itself. However, the functional links between the two are strong with Shrewsbury offering an ideal opportunity to meet the Black Country's needs without any incursion into the Green Belt – a matter which lies at the heart of a significant level of objection to this aspect of the Plan.

Paragraph 16.188 of the Update Topic Paper explains that a key pillar of the exceptional circumstances justifying the removal of land from the Green Belt at Shifnal relate to the benefit of the town and its economy. This view, however, is at odds with those that live and work in the town currently with Shifnal Town Council and Shifnal Matters presenting a significant level of objection to the plan's during the examination to date. In which case there is strong merit in investigating whether the exceptional circumstances test has genuinely been passed to warrant allocation at Shifnal and indeed whether the Council's disregard for Shrewsbury as a location at which the needs of the Black Country can be met is warranted.

The merits of our client's Site SHR197/SHR197VAR to meet the shortfall: Considering each of our three concerns listed above in combination there is clearer merit than ever for the consideration of our client's land at Battlefield Roundabout for allocation as one of the Council's key employment sites. Indeed, the Council's inclusion of our client's land at Battlefield Farm in the Regulation 18 Pre-Submission draft was entirely logical and

represented a positive response to the issues raised by the Council's own evidence base at the time – to reintroduce it at this stage would represent a similarly logical response now. Across our client's responses to the emerging plan a substantial suite of technical and marketing information was provided to officers demonstrating that our client's site is both devoid of any physical and environmental constraints and is located in a sustainable and commercially desirable location for prospective future investors.

Somewhat perversely, and despite the compelling case put forward in respect of both the merits of our client's land and the issues faced by the current proposed employment sites in the town (SHR166 in particular) we now encounter a position where the 9ha parcel at Battlefield Farm no longer features in the draft plan before the Inspectors. As we have contested throughout the latter stages of the plan process insufficient clarity is provided by the evidence base to explain or justify the Council's refusal to acknowledge our client's land as an appropriate employment site, particularly considering its location within a strategic corridor.

The plan's evidence base does not identify any technical constraints to the delivery of the site and it goes without saying that its location and relationship with the urban area has remained a constant throughout the plan process – in identifying the site as an allocation in the Pre-Submission draft it was clearly accepted by officers that the site would be able to come forward without any prejudice to the settlement pattern of Shrewsbury. Indeed, the allocation of the site would complement the commercial uses and existing allocations that currently exist on three sides of the roundabout between the A5124/Battlefield Road, Battlefield Road/A49 and A53/Shrewsbury Road spurs. Reflecting on this the marketing report prepared by Andrew Dixon and Co and submitted at Regulation 18 stage stated *"the site would enhance an already established commercial hub to the north of the town and consequently play a key role in ensuring that the Local Authority can provide a flexible and deliverable supply of employment land in Shrewsbury"*. This remains the case.

Otherwise, the site is marketable, viable and almost immediately deliverable. A key focus of officers should be on ensuring any future employment allocations are not only sustainable but offer a high level of certainty that they will be delivered. This is the very best way of securing inward investment without risk to the end user. Since January our client has undertaken a significant level of additional analysis of the site as well as existing commitments and latent demand for commercial sites at Shrewsbury which has resulted in the production of a draft first phases scheme at their land which will meet the needs of three operators seeking to either upscale locally or relocate to Shrewsbury, all of whom have engaged in detailed discussions with our client around site specification.

We enclose two iterations of the proposed masterplan for our client's land – one which accords with the extent of the draft allocation at Regulation 18 stage and the area covered by Site SHR197VAR (two operators), and one which demonstrates how the entirety of their land (SHR197) could be delivered for employment purposes through a multi-phase approach. Otherwise, both masterplans have fully considered all relevant constraints and specific operator requirements.

We trust that these observations are helpful and enable the Council and the Inspectors to draw out the key issues to be investigated at any future hearing sessions. In short, we feel that the Council simply must do far more to ensure its plan contains an employment land strategy that meets the needs of both Shropshire and the Black Country at demonstrably deliverable sites and at the most appropriate locations for strategic growth. We of course remain keen to participate fully in the examination of the plan as it proceeds and fully expect all of the matters raised above to form part of the anticipated next round of hearings.

Submission to Shropshire Local Plan EiP
On behalf of Manor Oak Homes

Yours sincerely

Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

Armstrong Rigg Planning

Encs



ZONE A		
Total GIA	10,740 sq m	115,600 sq ft
ZONE B		
Total GIA	14,957 sq m	161,000 sq ft
ZONE C		
Total GIA	14,957 sq m	161,000 sq ft
ZONE D		
Total GIA	22,130 sq m	238,200 sq ft
GRAND TOTAL		
Total GIA	62,784 sq m	675,800 sq ft

DRAFT AREAS ONLY - AREA SCHEDULE TO BE ADDED ONCE MASTERPLAN LAYOUT FINALISED

Revisions:		
P01	First Issue	13.07.23 sh
P02	Road access repositioned / scheme revised	24.08.23 sh

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BATTLEFIELD ROUNDABOUT SHREWSBURY

SITE PLAN INDICATIVE MASTERPLAN

Status	FEASIBILITY
Drawn by:	SPH
Checked by:	RM
Date	JULY 2023

Document Number:
 Project Code Zone Level Info Type Role Job No. Dwg No. Revision
SHR-PHP-XX-00-DR-A-4641-005-P02
 Scale@ A1 1:1250

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Revisions:
P01 First Issue
01.02.24 sh

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**BATTLEFIELD ROUNDABOUT
SHREWSBURY**

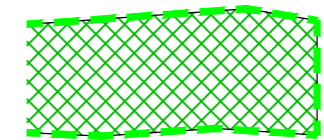
**SITE PLAN
INDICATIVE MASTERPLAN**

Status: FEASIBILITY
Drawn by: SPH Checked by: RM
Date: FEBRUARY 2024

Document Number:
SHR-PHP-XX-00-DR-A-4641-007-P01

Scale@ A1 1:1250
0 25m 50m SCALE 1:1250

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BIODIVERSITY NET GAIN AREA
8.1 HECTARES
20.0 ACRES



PUBLIC FOOTPATH SHROPSHIRE
RIGHTS OF WAY (04/21/19/22 -
INCLUDING INVERTED SECTION)