

## Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11<sup>th</sup> June 2024**.

Name and Organisation:	Stuart Thomas Berrys on behalf of Salop Leisure Holdings Limited
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### Q1. To which document(s) does this response relate?

<b>a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.</b>	<input type="checkbox"/>
<b>b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.</b>	<input checked="" type="checkbox"/>
<b>c. Updated Housing and Employment Topic Paper.</b>	<input checked="" type="checkbox"/>
<b>d. Updated Green Belt Topic Paper.</b>	<input type="checkbox"/>

### Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	See text below
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### Q3. Do you consider the document(s) are:

- A. Legally compliant      Yes:       No:
- B. Sound      Yes:       No:

### Q4. Please detail your comments on the specified document(s).

**Please be as precise as possible.**

This consultation response is made on behalf of Salop Leisure Holdings Ltd which has engaged with the Council through a pre-application enquiry (Ref. PREAPP/23/00081) process to consider the Land At Boretton Grange, Cross Houses, Shrewsbury, Shropshire, SY5 6HT. The land was not included in any previous submissions for the new Local Plan.

Salop Leisure Holdings are a long-established Shropshire business who's growth has brought an increase of tourism and jobs to Shrewsbury; Shropshire's Strategic Centre.

Salop Leisure Holdings Ltd consider that the Local Plan would benefit from less reliance on windfall employment land delivery and a highly constrained site (SHR166).

It is considered that the Local Plan would benefit from less reliance on windfall employment land delivery. Document GC45 places all 20Ha of employment uplift in the category of being delivered by windfall development. This reliance on windfall means the Plan is not positively prepared because it does not specifically seek to meet the identified need for employment but rather states that it will be found on a bank of sites which are not specifically identified.

Secondly, the Local Plan continues to place reliance on allocation SHR166 which since putting this forward for allocation has now become heavily constrained and the originally estimated 45Ha to be delivered will be substantially less.

The Plan is not positively prepared due to not specifically seeking to meet the identified need for employment but instead stating that it will be found on windfall sites which are not specifically identified.

While the current consultation is not inviting comments on other aspects of the draft Shropshire Local Plan it is relevant to reference the representations made on behalf of Salop Leisure Holdings Ltd through the pre-application process, so far as this is relevant to the current documentation as it brings forward a deliverable employment site which would take some pressure off the level of windfall needing to be delivered. This would help for the plan to be positively prepared and set out a clear economic vision and strategy.

The consultation response is made in respect of documents GC44 and GC45 and each is considered further as follows.

GC44 Shropshire Local Plan Updated Additional Sustainability Appraisal Report - April 2024

This document has been requested by the Planning Inspectors to update the previous sustainability appraisal in light of the additional housing and employment land requirements to meet the need of the Association of Black Country Authorities. While agreement has been reached between Shropshire Council and the Black Country authorities as to the number of additional houses and area of employment land this agreement was reached between Regulation 18 and 19 stages of the Local Plan preparation and after the original sustainability appraisal was produced. GC44 seeks to assess the effects of the strategy and consider alternative options.

It has since been published that there are significant concerns in relation to the delivery of SHR166 which was set to deliver 45ha of employment land. Within GC44 it states that 'much of the site contains a newly designated Scheduled Monument'.

This will significantly reduce the available site area and require the need for further employment to be brought forward.

The site brought forward by Salop Leisure at Boreton Grange falls on 14.8 Hectares of land and could deliver 45,000 square metres of employment floorspace on the edge of Shrewsbury in a sustainable location.

The site brought forward by Salop Leisure has not yet been tested against Shropshire Council's sustainability criteria listed in the tables in GC44. The sustainability of the preferred allocation sites were assessed against the walking distance to facilities and services such as schools, open space, playground or doctors surgeries etc.



Rather than listing the full table this representation has calculated where the points and minus values would be, and the overall score would be 0. This would therefore score as 'good' for overall settlement sustainability conclusion and 'good' for overall black country contribution sustainability conclusion.

Some of the Council's recommended locations for additional growth in Shrewsbury fail to score as "good" by its own assessment without subsequent qualification and mitigation. The key one of SHR166 scores as 'poor' which is two categories below the site brought forward within this representation.

In addition to the excellent sustainability rating there are also already specific operators already interested in the site, therefore, it would be delivered in the near future.

The site is unconstrained, and all of the land can be used for employment purposes. It would seem unnecessary to leave such a valuable site unallocated when Shropshire Council need to accommodate a 20 Hectare uplift and currently have now allocation towards this.

GC45 Updated Housing and Employment Topic Paper - April 2024

The updated housing and employment topic paper is informed by the updated sustainability appraisal do these documents need to be considered together. GC45 considers a range of options for growth adopting a high growth preference as being the most sustainable model for Shropshire. In principle this is supported because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.

The Housing and Employment topic paper distributes additional growth to Shrewsbury, Whitchurch and Buildwas.

Paragraph 7.24 of the topic paper confirms that in the Council's view that there is a correlation between greater growth and greater economic and social benefits derived from the development that greater growth provides, either on site or through CIL or s106 contributions.

It then suggests that greater growth conversely generates greater adverse environmental impacts. This is not necessarily true. Clearly development of a greenfield site may be considered to be an environmentally adverse impact but in some cases the development of the greenfield site may also resolve a pre existing environmental constraint such as pluvial flooding. Alternatively, there may be pre-existing contamination or other geotechnical issues that development would resolve through appropriate remediation. It is not therefore automatically the case that development will be environmentally detrimental.

Point 2.25 of the GC45 paper states that on top of the 320 hectares required there is now an uplift of 20 hectares on the employment land requirement proposed in the submission version of the Plan. Shropshire Council have brought forward 4 options to accommodate this. None of these options are to allocate further employment land, this appears to be an oversight on their part as it should have been an option for consideration and it should have been concluded to be the most sustainable and sound approach.



With Shropshire Council placing a focus on the urban and Shrewsbury being the strategic centre, the site brought forward in this representation which is adjacent to Shrewsbury and acts as a natural extension should be considered. This site would comply with the future policies and provide a substantial contribution to the 20Ha uplift established to be delivered by windfall sites. It would be much more reasonable to sufficiently allocate land instead of relying heavily on windfall sites.

Paragraph 86 of the NPPF states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Shropshire

Council's option to Utilise Settlement Guidelines and Windfall Allowances to deliver a large portion of employment land is not a clear economic vision and for this reason the local plan is not consistent with national policy.

For the reasons stated above it is considered that Shropshire Council should re-evaluate how it is delivering the 20Ha uplift of employment land and the deliverability of SHR166. With this re-evaluation completed it is considered that a conclusion should be reached that there is a need for further allocated sites. The site under Salop Leisure Holdings Ltd's control is sustainable when considered in line with Shropshire Council's sustainability appraisal scoring. It is seen to be considerably more sustainable than SHR166 and offers good deliverability with operators already showing interest in the site. Owing to its sustainability and unconstrained nature this site should be Shropshire Council's primary choice in any allocation to meeting their 20 Hectare uplift requirement.

*(Please continue on a separate sheet if necessary)*

***Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.***

#### **Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?**

*Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.*

No, I do not wish to/consider it necessary to participate in hearing session(s)

Yes, I consider it is necessary/wish to participate in hearing session(s)

*The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.*



