

Shropshire Local Plan Examination

Shropshire Council Response to:

**ID40: Stage 2 Matters, Issues and
Questions**

Matter 28



Matter 28 - Retail and Leisure policies (policies DP9 & DP10)

Issue: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the provision of retail and leisure development.

Questions: Policy DP9 – Managing and Supporting Town Centres (see MM044)

Question 1. *Is the policy justified, effective and consistent with national planning policy?*

Shropshire Council Response:

- 1.1. A modification is proposed to draft Policy DP9, as detailed in the schedule of proposed main modifications (GC4m), to ensure it reflects changes to the national Use Classes Order from September 2020.
- 1.2. Subject to this modification, Shropshire Council considers draft Policy DP9 is justified, effective and consistent with national policy.
- 1.3. The intention of this draft policy is to maintain and enhance the vitality and viability of Shropshire’s network of Town Centres and High Streets. This has been particularly important since the global financial crisis in 2009 and the Covid-19 pandemic. Online sales have continued to rise, most retailers are building less retail floorspace, operators have found that less existing floorspace is required and existing floorspace is being converted into alternative uses. All retail location types; town centres, retail parks and shopping centres, have experienced a rising vacancy rate and an increase in the net loss of retail units.
- 1.4. Policy DP9 provides a flexible base by which to manage and support development in defined town centres and other recognised high streets, and in doing so accepting that these areas will need to expand beyond their more traditional retail roles, to incorporate a wider range of main town centre uses (as defined by the 2021 National Planning Policy Framework (NPPF)).
- 1.5. However, it continues to recognise the importance of maintaining the integrity of these areas and in doing so that sequential and impact tests continue to apply to proposals in relevant circumstances (as defined in the policy and/or NPPF).

- 1.6. The draft Policy aligns with and is supported by a number of other policies in the draft Shropshire Local Plan, particularly the settlement policies S1-S18. As such, it supports the achievement of the vision, objectives and spatial strategy proposed within the draft Shropshire Local Plan.
- 1.7. The Council considers the requirements of this policy are justified, as they are responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
- 1.8. A key component of this evidence base is the Shropshire Town Centres Study (EV114), which provides an assessment of the health of town centres across Shropshire in order to inform new retail and town centre policies for Shropshire. This includes recommendations on town centre boundaries and locations of primary shopping areas.
- 1.9. The assessment and recommendations within this study have directly informed draft Policy DP9 and the extent of proposed town centres, primary shopping areas and key high streets in smaller settlements, as illustrated in the draft Policy Map. In summary:
 - a. There is a preference to accommodate main town centre uses within the defined town centres of the Strategic Centre of Shrewsbury; and the Principal Centres of Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch, as shown on the Policies Map.
 - b. Main town centre uses will also be supported within and adjoining the existing high streets of the following Key Centres: Albrighton, Bishops Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem.
- 1.10. Other key components of the evidence base which have informed this draft Policy include the Sustainability Appraisal (SD006.01-SD006.22) (SA), which concludes this draft policy will have a significant positive effect on SA Objectives 2, 4 and 5 (encouraging a strong and sustainable economy, promoting access to services for all, and encouraging use of sustainable means of transport) and no significant negative effects.
- 1.11. The draft policy has also been subject to and informed by Regulation 18 (Plan-Making) and Regulation 19 (Pre-Submission) consultations.
- 1.12. The Council considers this policy is effective as it provides:
 - a. Clear expectations on preferred locations for town centre uses (defined town centres and high streets) and the requirements if such uses are proposed in other locations.
 - b. Details of the circumstances when main town centre uses will not be considered appropriate.

- c. Prioritisation of forms of development appropriate within defined town centres, primary shopping areas, and high streets.
 - d. Recognition of the importance of considering health and wellbeing when determining the suitability of proposals for hot-food takeaways (where planning permission is required).
 - e. Recognition of the role of neighbourhood based local shopping locations.
- 1.13. The Council considers this policy is consistent with national policy, particularly Chapter 7: Ensuring the Vitality of Town Centres (paragraphs 86-91) of the NPPF.

Questions: Policy DP10 – Tourism, Culture and Leisure

Question 1. *Is the policy justified, effective and consistent with national planning policy?*

Shropshire Council Response:

- 1.1. Yes, Shropshire Council considers this draft policy is justified, effective and consistent with national policy.
- 1.2. The intention of this draft policy is to establish the policy framework to deliver high quality and sustainable tourism, culture, and leisure development; which enhances the vital role that these sectors play in the local economy, benefits local communities and visitors, and is sensitive to Shropshire’s intrinsic natural and built environment qualities.
- 1.3. Recognising the success of the current approach to such development within the adopted Development Plan, draft Policy DP10 constitutes an evolution of this approach, amended to reflect subsequent change to national policy.
- 1.4. Shropshire Council acknowledges that such development can deliver wide ranging benefits for the County, contributing to a successful visitor economy; providing a potential focus for regeneration; supporting the quality of life of local communities; and promoting social inclusion. These sectors can also play a significant role in ensuring the economic prosperity of Shrewsbury, our Principal and Key Centres, our rural settlements, and the wider rural area.
- 1.5. In light of this, Shropshire Council encourages high-quality and sustainable tourism, culture and leisure developments in appropriate locations. But equally seeks to limit such provision in less sustainable locations.
- 1.6. The Council considers the requirements of this draft policy are justified, as they are responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.

- 1.7. In particular the Sustainability Appraisal (SD006.01-SD006.22) (SA), which concludes this draft policy will have a significant positive effect on SA Objectives 2 and 4 (encouraging a strong and sustainable economy and encouraging use of sustainable means of transport) and no significant negative effects.
- 1.8. The draft policy has also been subject to and informed by Regulation 18 (Plan-Making) and Regulation 19 (Pre-Submission) consultations.
- 1.9. The Council considers this policy is effective as it provides clear requirements for tourism, culture, and leisure development. The policy ensures that such development is high quality and sustainable, enhances the vital role that these sectors play in the local economy, benefits local communities and visitors, and is sensitive to Shropshire's intrinsic natural and built environment qualities.
- 1.10. The Council considers this policy is consistent with national policy, particularly paragraphs 84 and 85 of the 2021 National Planning Policy Framework (NPPF) which supports prosperous rural economies; and paragraph 80 of the NPPF which deals with rural housing.

Question 2. *Is the policy too restrictive or should it be more restrictive?*

Shropshire Council Response:

- 2.1. Shropshire Council considers this policy is appropriate, 'striking an appropriate balance' between supporting high quality, sustainable tourism and cultural and leisure development; and ensuring such development is appropriately located, sensitive to Shropshire's intrinsic natural and built environment qualities, and aligns with the wider spatial strategy in the draft Shropshire Local Plan.
- 2.2. The Council recognises that high quality, sustainable tourism and cultural and leisure development can play an important role in supporting the visitor economy of Shropshire, particularly in rural areas. However, it equally recognises that this must be achieved in a manner that is sensitive to Shropshire's intrinsic natural and built environment qualities – which are often the drivers for tourism, cultural and leisure activities.
- 2.3. With specific regard to visitor accommodation, the Council recognises that can make a positive contribution to tourism and the visitor economy. As such, appropriate provision of visitor economy is supported in the draft policy.
- 2.4. In the first instance, the draft policy seeks to direct such provision to settlements best able to provide the services, facilities and infrastructure to support such accommodation.

- 2.5. However, it also recognises that in some circumstances it may be necessary and appropriate for such provision in more rural locations. As such, it provides clear circumstances within which such provision is appropriate. This includes where it is of exceptional quality as outlined in paragraph 80(e) of the 2021 National Planning Policy Framework (NPPF).
- 2.6. In circumstances where visitor accommodation is supported, the Council considers that it is critical to ensure that it remains available for this purpose, as its loss to other uses could negatively impacts on tourism and the visitor economy - particularly as such provision often occurs in locations which would not be considered appropriate for general residential dwellings. This is achieved through the imposition of appropriate conditions, which is consistent with current practices employed by the Council.