

Shropshire Local Plan Examination

Shropshire Council Response to:

ID40: Stage 2 Matters, Issues and Questions

Matter 4, Question 1 Addendum

1. A reassessment of site SHR166 – land to the west of the A49, Shrewsbury, has taken place in recognition of the site’s location partly within the recently designated Scheduled Monument, which was confirmed to the Examination in October 2022. In doing so, it is noted that Historic England re-confirmed their objection to the allocation of this site in its response to the consultation on additional material in 2024.
2. The Council’s response to Matter 26 has provided commentary on the conclusions of this assessment. In summary, due to the likelihood of substantial harm being caused to the Scheduled Monument, and the lack of public benefit identified, it is considered the proposed allocation of the site for employment purposes should be removed from the Plan due to a lack of justification.
3. In considering the implications of the proposed removal of the site, the Council consider the impact on employment land supply over the plan period, within the context of delivering the proposed employment requirement of 320ha. The Council has also considered the implications for Shrewsbury in particular. This is shown below in an updated Table 17.1 Strategic Employment Land Supply (31st March 2020) taken from GC45 Updated Housing and Employment Topic Paper (April 2024).
4. As set out above, taking account of monitoring of employment land completions since 2016 up to March 2020, the situation is:
 - Proposed Employment Land Requirement 2016-2038: 320ha (minimum)
 - Employment Land Completed since 2016 – 50ha
 - Outstanding requirement – 270ha (minimum)
 - Employment Land Supply* - 318ha*

* from updated Table 17.1 includes employment land permissions, ‘saved’ employment allocations and proposed new allocations **BUT, excludes completions since 2016 (50ha) and site SHR166 (45ha).**

Table 17.1: Strategic Employment Land Supply (31st March 2020)

Amendments undertaken show:

- (1) checked rounding of calculations for total supply calculation
- (2) reduced total supply from removal of site SHR166 Land west of A49, Shrewsbury (45ha) and
- (3) footnote explaining the 'windfall' element of supply.

Location	Completions	Permissions	Allocations		SUMMARY OF SUPPLY
			Saved Sites without Permission	Proposed in Draft Plan	
			hectares		
SHROPSHIRE	50	101	128	89	368
Strategic Centre Shrewsbury	8	38	9	5	60
Hubs		0.2			0.2
Clusters					
Principal Centres	15	23	84	33	155
Hubs	2.5	3.2			5.7
Clusters	0.5	3.1			3.6
Key Centres	3	9.5	33	39	84.5
Hubs	1.1	1.5	1.4		4.0
Clusters	0.01				0.01
Strategic Settlements:					
Clive Barracks, Tern Hill				6	6
Former Ironbridge Power Station				6	6
Rural Settlements & Countryside	20	23	0.3		43

The Updated Housing and Employment Topic Paper (April 2024) in 'Figure 18.1: Summary of Employment Land Need, the proposed Employment Land Requirement and Employment Land Supply' (on page 163) refers in the Employment Land Supply explanatory text to 'Completions and commitments with windfall sites'. These windfall sites are previously unidentified sites included in the Completions (50 hectares) and Permissions (101 hectares) in the employment land supply now comprising 368 hectares (previously 413 hectares) after the removal of site SHR166 - Land west of the A49, Shrewsbury.

5. This position shows that without SHR166 there remains a sufficient supply of employment land to achieve the proposed employment land requirement in the plan period. This has been addressed ‘in principle’ in the Council response to Matter 4 under Question 1 in paragraphs 1.13 to 1.16. The employment land supply evidence presented above is taken from EV012 Authority Monitoring Report 2020 as summarised in GC4n Employment Strategy Topic Paper in Table 4.
6. With regard to implications for Shrewsbury, it is recognised that policy S16 (Shrewsbury Development Strategy) indicates the importance of fostering economic development to reflect Shrewsbury’s strategic role. The expectation in Policy S16 is for Shrewsbury to deliver around 100ha of employment land during the plan period. It is evident that the proposed allocation of SHR166 was part of this strategy. Given the proposal to remove SHR166, it is appropriate to look at options for how Shrewsbury could continue to deliver this scale of employment land.
7. Policy S16 looks to a number of sources of employment land supply, namely: saved SAMDev mixed use and employment allocations; new Local Plan allocations; and opportunities to enhance existing high quality employment facilities. It is also specifically recognised that the delivery of the North West Relief Road (NWRR) will create land opportunities between the proposed line of the NWRR and the proposed development boundary, subject to considerations in policies SP13 and SP14 and where suitable access can be provided. I
8. In looking at options for delivery, it is recognised the Council produced the document an *Overview of Shrewsbury ‘Strategic’ Employment Development Options Assessment* (GC9) in response to the objection from Historic England to the allocation of SHR166. It is important to note this assessment was undertaken in the context of SHR166 being a non-designated heritage asset prior to the Scheduling of the site (and in the context of Historic England’s principal objection at that time, to the perceived impact on the setting of the Scheduled Monument at Haughmond Hill).
9. The assessment of strategic employment options (GC9) provides an overview of the sites which were considered to be available to the Council to allocate a strategic employment site in Shrewsbury. GC9 provides a summary of the site assessment conclusions for 15 sites which were considered to be of a sufficient scale to deliver a strategic employment site (25ha+). Of these 15 sites, 4 sites were considered realistically available for the desired purpose. These were:
 - SHR109
 - SHR157/SHR157VAR/SHR225
 - SHR166

- SHR198

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10. GC9 provides a summary of the conclusion of the site assessment process for each of these site. In short, only SHR166 was considered to provide a suitable location for a new strategic employment area for Shrewsbury and Shropshire. It is considered that the proposed removal of SHR166 from the Local Plan does not alter the conclusions of these site assessments with regard to the other three sites.

11. It is recognised that through the recent consultation process on the 'additional material' a further potential employment site was promoted by Salop Leisure Holdings Ltd (Rep 0264) on land at Boreton Grange. This site is being promoted to provide an alternative to windfall development promoted in the Housing and Employment Topic Paper (April 2024) in order to accommodate the additional proposed 20ha of employment land. This issue is dealt with in the Council's response to this question, but it should be recognised that this site comprises 14.8ha. The scale of this site would not represent a strategic employment area, and therefore the Council does not feel it necessary to update GC9 to include consideration of this site for the purpose of replacing SHR166 in the employment land supply.

12. Having reconsidered the conclusions of GC9, and in light of the proposed removal of SHR166 from the Local Plan, it is the Council's view there are no appropriate site options available to the Council to accommodate a strategic employment area in Shrewsbury. It is worth pointing to the fact that, the Council regard the loss of SHR166 to be principally a 'qualitative' loss to the employment land supply and that it remains possible to deliver a minimum of 320ha of employment development from the remaining employment land supply.

13. In light of this, it is also considered that there are further options for the delivery of additional employment land in Shrewsbury which will support the delivery of around 100ha of employment land in the Strategic Centre over the plan period to 2038 (as part of the overall requirement of 320ha). These options have the potential to be permitted within Policies SP13, SP14 and S16 and should take account of the wider employment land supply position and the spatial strategy for the County. These options reflect the lack of an obvious single 'qualitative' alternative to SHR166 to provide a new strategic employment allocation for the town. However, they provide a range of opportunities to deliver further significant windfall employment sites during the lifetime of the plan, especially within or adjoining Shrewsbury as the Strategic Centre of Shropshire.

14. In taking the above into account, it is the Council's view that given the healthy (and potentially improving) position of the Council's overall employment land supply (even with the loss of SHR166) it is considered unnecessary to specifically allocate additional employment sites in the Plan. This position is further supported by a consideration of the opportunities presented by draft policies SP13, SP14 and S16.

15. Policy SP13(6) identifies the circumstances where Windfall Class B employment development on sites not allocated for development will be supported. Further to SP13(6)(g), the sequential preference in Policy SP14(3)(c) for major employment development (including large scale inward investment) on appropriate windfall sites specifically supports locations immediately adjoining Shrewsbury, as the Strategic Centre. S16(7) builds upon this strategic policy framework in relation to Shrewsbury, identifying land opportunities for windfall employment development presented by the delivery of the North West Relief Road (NWRR). Paragraph 5.225 expands upon this by specifying that these opportunities are for commercial windfall development. The NWRR has received a resolution for approval, and at the time of this response, is in the advanced stages of agreement on its S106 provisions. Construction of the NWRR is therefore scheduled to commence in 2025, with a completion date in late 2027, which is well within the proposed Plan period to 2038.