

<b>NORTH PLANNING COMMITTEE</b>		
<b>SCHEDULE OF ADDITIONAL LETTERS</b>		
<b>Date: 6<sup>th</sup> July 2021</b>		
<p>NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting</p>		
<b>Item No.</b>	<b>Application No</b>	<b>Originator</b>
6	20/04123/FUL - Wharf Caravan Park	Case Officer
Email confirmation has been received from the agent 28.5.21 confirming acceptance of the pre-commencement conditions.		
<b>Item No.</b>	<b>Application No</b>	<b>Originator</b>
6	20/04123/FUL	Case Officer
<p>In liaison with the Council's Solicitor an additional condition is recommended for inclusion on any permission granted by officers to limit the number of caravans to 38 only as per the description of development. The additional recommended condition is worded as follows:</p> <p>No more than 38 caravans of any description shall be stationed on the site at any time.</p> <p>Reason: To control the use of the site in order to protect local amenity and visual character and avoid adverse impacts on highway safety.</p>		
<b>Item No.</b>	<b>Application No</b>	<b>Originator</b>
7	21/02234/LBC	Case Officer
<p>Officers recommend that, if listed building consent is granted, condition 4 is amended to read as follows:</p> <p>4. If hitherto unknown architectural evidence of historic character that would be affected by the works hereby permitted is discovered, an appropriate record, together with recommendations for dealing with it in the context of the scheme, shall be submitted for written approval by the Local Planning Authority. <u>The development shall thereafter be undertaken in accordance with the details approved.</u></p> <p>Reason: To ensure architectural features are recorded during development.</p>		
<b>Item No.</b>	<b>Application No</b>	<b>Originator</b>
8	21/01334/EIA	Case Officer
<p><b>Consultation on planning application:</b> Hybrid Planning Application for: Full planning permission - formation of a 360m spine road; two 3.5m wide foot and cycleways; one 2m wide footpath; one electricity substation; supporting utilities infrastructure; drainage system; landscaping and ancillary works; Outline planning permission - 10 plots to be delivered in four phases, providing: - a hotel (use class C1) up to 30,000sq. ft; - three units providing up to 6,000sq. ft of hospitality and up to 3000sq. ft of services; - five mixed use units providing general industry with ancillary office (B2 &amp; E) providing up to 180,000sq. ft; - one office unit (use class E) providing up to 15,000sq. ft;</p>		

- one light industrial unit (use class E) providing up to 63,000sq. ft;
  - two mixed use units providing storage/distribution with ancillary office (B8 & E) providing up to 200,000sq. ft;
  - the provision of green infrastructure and all ancillary works.
- @ Land Off Mile End Roundabout, Oswestry, Shropshire

### **RECOMMENDATION:**

No objection. Conditions have been recommended to ensure the protection of wildlife and to provide ecological enhancements under NPPF, MD12 and CS17. A European Species three tests matrix has been completed, as the development impacts upon great crested newt (GCN).

### **Comments**

#### **Great crested newt (GCN)t**

Fourteen waterbodies are present within 500m of the Site, one pond (Pond 1) is present within the Site, and two ponds (Ponds 2 and 5) are within the survey area. Updated HSI surveys were undertaken on Ponds 1 and 2 in 2020. The results of the HSI surveys recorded Ponds 1 and Ponds 2 as 'Good' and Pond 5 as 'Average'. An eDNA survey of Ponds 1 and 5 were undertaken in 2019 (in relation to the nearby Mile End Junction Improvements scheme), where the results returned Positive for great crested newt presence. An eDNA survey was undertaken on Pond 2 in 2020 which returned a negative result. Pond 5 was dry at the time of the 2020 eDNA survey.

Following population class size assessment surveys in 2019, in relation to the Mile End Junction Improvements scheme, it is considered that a small population of great crested newt is present within the farmland on Site within Pond 1 and Pond 5. Previously, a GCN mitigation licence has been granted by Natural England for works in conjunction with the Mile End Junction Improvements scheme (20/00283/FUL) with trapping, translocation and habitat enhancement undertaken. The location of the GCN receptor area is along the northern boundary of the current application boundary and is retained within proposals.

The development will lead to the loss of terrestrial habitat within 250m of ponds where GCN presence has been confirmed, and therefore, to ensure the favourable conservation status of GCN are maintained as a result of this application, the applicants have provided two signed Impact Assessment and Conservation Payment Certificate (IACPC) as evidence that the application site has been accepted into the District Level Licensing (DLL) scheme for great crested newt, which is run by Natural England for Shropshire. One IACPC is for the full application boundary, the other for the outline part of the application. It should be noted that the application boundary is not wholly encompassed by the two IACPC as part of the redline has already been covered by a traditional licence granted by Natural England for the roundabout works.

The Shropshire GCN DLL scheme allows for a strategic approach to ensure that the favourable conservation status of GCN in their natural range is maintained. This is through payment of a conservation payment that allows for the impacts on GCN (through a planning application) to be adequately compensated. It is therefore considered that the proposals will not be detrimental to the maintenance of the population of GCN at a favourable conservation status in their natural range.

As GCN are a European Protected Species, I have provided a European Protected Species 3 tests matrix at the end of this response.

The planning officer needs to complete sections 1 and 2, 'over riding public interest' and 'no satisfactory alternative.' The EPS 3 tests matrix must be included in the planning officer's report for the planning application and discussed/minuted

at any committee at which the application is considered. The form provides guidance on completing Sections 1 and 2 but please get in touch if additional assistance is required.

With regards to the area of the application which is not covered by either of the two DLL certificates, (along the western part of the site), this has been cleared of GCN under the traditional mitigation licence granted in connection with 20/00283/FUL. WSP have submitted a letter (dated 30 June 2020 Ref: 70073103) and accompanying plan (Figure 1 - 'Planning and Scheme Boundaries') clarifying the position with regards to the approach to GCN for the current application, for the area shown as orange land in Figure 1 (ie not covered by the DLL scheme).

Existing exclusion fencing will either remain in place whilst habitat clearance is undertaken in the orange area, or, if this is not possible, due to project timeframes, vegetation clearance and ground disturbance would be undertaken under RAMS, which are detailed in the letter. The likelihood of GCN being present in the orange area whilst works are undertaken is considered to be very low; the area has been cleared of GCN and during the clearance no GCN were captured from this area. Given the nature and size of affected habitats, it is considered unlikely that GCN would be present in the orange area and this is therefore considered to be a reasonable approach.

A condition is recommended to ensure that works in the orange area of Figure 1 (not covered by either of the DLL schemes) is undertaken in accordance with the measures detailed within the letter, to reduce the likelihood of impacting GCN, so that it would be highly unlikely that an offence under The Conservation of Habitats and Species Regulations 2017 (as amended) would occur.

#### Bats

Trees across the site have been assessed for their potential to support bat roosts, and additional surveys of trees to be removed as part of the full application have been undertaken where necessary, to investigate the presence/likely absence of roosting bats. I am happy with the survey effort expended, which indicates that bat roosts are likely absent from trees to be removed as part of the full application.

In terms of the outline application, trees have also been assessed for their likelihood to support roosting bats, however, as proposals are outline, with detailed matters to be reserved, update bat surveys would be required on trees which are identified for removal or are affected by works. A condition to ensure these surveys are submitted as part of a reserved matters application is therefore recommended.

#### Biodiversity

The application is accompanied by a Biodiversity Impact Assessment calculation and report, which provides a quantitative measure of biodiversity pre and post development in terms of habitat area and hedgerows. The calculation indicates that there will be a net loss of biodiversity habitats in area terms from the Proposed Development (both full and outline) in the order of -1.13 habitat units and -2.05 habitat units respectively. However the proposals will lead to the loss of habitat of only low distinctives, largely replaced with higher distinctiveness habitats including species-rich grassland, woodland, scrub and a pond. SUDS features will also have biodiversity value and include swales, rain gardens and attenuation basins.

In addition, the application on this site is closely coupled with works that have already taken place on the roundabout and the pedestrian bridge, which resulted in a biodiversity unit change of +11.51 and -0.87 habitat units respectively. It is therefore highly likely that the scheme as a whole will deliver a net gain, but nevertheless at worst a no net loss.

The landscaping for the outline application is indicative only, and opportunities to include increased planting and habitats for biodiversity are available when each reserved matter application for each phase is submitted. It is therefore envisaged that the landscaping can be optimised further for biodiversity, by way of including perhaps another wildlife pond into the design, increasing scrub planting and provision of more amphibian hibernacula.

A condition is therefore recommended that requires details of landscaping to be submitted for each phase of development, demonstrating how it contributes to a no net loss of biodiversity for the scheme as a whole.

Additional features such as amphibian hibernacula should also be provided and it is noted that amphibian friendly drainage features are to be installed throughout the development to ensure incidental mortality of amphibians is avoided.

#### Recommended Conditions

#### **GCN RAMS**

All ground clearance and vegetation removal works in the area shown orange on Figure 1 of letter reference 70073103, dated 30 June 2021 from WSP, shall be undertaken in accordance with the details as contained within the letter reference 70073103, unless otherwise agreed with the Local Planning Authority.

Reason: To ensure the protection of Great Crested Newts, a European Protected Species

#### **Habitat management plan condition**

Reserved matters for each phase of development shall include a habitat management plan. The plan shall include details of the following:

- a) Description and evaluation of the features to be managed;
- b) Ecological trends and constraints on site that may influence management;
- c) Aims and objectives of management;
- d) Appropriate management options for achieving aims and objectives;
- e) Prescriptions for management actions;
- f) Preparation of a works schedule (including an annual work plan and the means by which the plan will be rolled forward annually);
- g) Personnel responsible for implementation of the plan;
- h) Detailed monitoring scheme with defined indicators to be used to demonstrate achievement of the appropriate habitat quality;
- i) Possible remedial/contingency measures triggered by monitoring;
- j) The financial and legal means through which the plan will be implemented.

The plan shall be carried out as approved.

*Reason: To protect and enhance features of recognised nature conservation importance, in accordance with MD12, CS17 and section 175 of the NPPF.*

#### **Landscaping Plan condition**

Reserved matters for each phase of development shall include a landscaping plan illustrating the inclusion of habitats and features for biodiversity. Each plan shall be drawn up in accordance with recommendations in *Section 4.2* of the Full Biodiversity net Gan Assessment (WSP Ltd, May 2021) and include:

- a. Planting plans for creation of wildlife habitats to optimise gains for biodiversity within the development;
- b. Written specifications (including cultivation and other operations associated with plant, grass and wildlife habitat establishment);
- c. Schedules of plants, noting species (including scientific names), planting sizes and proposed numbers/densities where appropriate;

- d. Native species used are to be of local provenance (Shropshire or surrounding counties);

The plan shall be carried out as approved for each phase of development. Any trees or shrubs which die or become seriously damaged or diseased within five years of completion of the development shall be replaced within 12 calendar months with trees of the same size and species.

*Reason: To ensure the provision of amenity and biodiversity afforded by appropriate landscape design*

#### **Update survey condition**

Each reserved matters application shall be accompanied by an update bat survey of all trees to be removed or impacted by proposals in that phase, in line with recognised national good practice guidance and include details of any necessary mitigation measures to be approved in writing by the Local Planning Authority prior to the commencement of development (or commencement of the next phase). Works will then be carried forward strictly in accordance with the proposed new approved mitigation measures.

*Reason: To ensure that development is informed by up to date ecological information and that ecological mitigation is appropriate to the state of the site at the time development/phases of development commence.*

#### **Lighting Plan condition**

Prior to the erection of any external lighting on the site, a lighting plan shall be submitted to and approved in writing by the Local Planning Authority.

The lighting plan shall demonstrate that the proposed lighting will not impact upon ecological networks and/or sensitive features, e.g. trees, and hedgerows. The submitted scheme shall be designed to take into account the advice on lighting set out in the Bat Conservation Trust's Guidance Note 08/18 Bats and artificial lighting in the UK. The development shall be carried out strictly in accordance with the approved details and thereafter retained for the lifetime of the development.

*Reason: To minimise disturbance to bats, which are European Protected Species.*

#### Informative

The active nests of all wild birds are protected under the 1981 Wildlife and Countryside Act (as amended). An active nest is one being built, contains eggs or chicks, or on which fledged chicks are still dependent. It is a criminal offence to kill, injure or take any wild bird; to take, damage or destroy an active nest; and to take or destroy an egg. There is an unlimited fine and/or up to six months imprisonment for such offences.

All vegetation clearance, tree removal and scrub removal and/or demolition work in buildings or other suitable nesting habitat should be carried out outside of the bird nesting season which runs from March to August inclusive.

If it is necessary for work to commence in the nesting season then a pre-commencement inspection of the vegetation and buildings for active bird nests should be carried out. If vegetation or buildings cannot be clearly seen to be clear of nests then an appropriately qualified and experienced ecologist should be called in to carry out the check. Only if there are no active nests present should work be allowed to commence / No clearance works can take place with 5m of an active nest.]

If during construction birds gain access to [any of] the building[s] or vegetation and begin nesting, work must cease until the young birds have fledged.

Please contact me, or one of the other Ecology team members, if you have any queries on the above.

Item No.	Application No	Originator
8	21/01334/EIA	Case Officer

### EUROPEAN PROTECTED SPECIES – Consideration of the three tests

Application name and reference number:

21/01334/EIA

Land Off Mile End Roundabout, Oswestry, Shropshire

Hybrid Planning Application for:

Full planning permission - formation of a 360m spine road; two 3.5m wide foot and cycleways; one 2m wide footpath; one electricity substation; supporting utilities infrastructure; drainage system; landscaping and ancillary works;

Outline planning permission - 10 plots to be delivered in four phases, providing:

- a hotel (use class C1) up to 30,000sq. ft;
- three units providing up to 6,000sq. ft of hospitality and up to 3000sq. ft of services;
- five mixed use units providing general industry with ancillary office (B2 & E) providing up to 180,000sq. ft;
- one office unit (use class E) providing up to 15,000sq. ft;
- one light industrial unit (use class E) providing up to 63,000sq. ft;
- two mixed use units providing storage/distribution with ancillary office (B8 & E) providing up to 200,000sq. ft;
- the provision of green infrastructure and all ancillary works.

Date of consideration of three tests:

30 June 2021

Consideration of tests one and two carried out by:

Philip Mullineaux  
Principal Planner

Consideration of third test carried out by:

Suzanne Wykes  
Specialist Practitioner (Ecology)

**1 Is the development ‘in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment’?**

Yes.

The Shropshire Local Development Framework: Adopted Core Strategy (2011) (the ‘Core Strategy’) identifies a shortage of suitable and available employment land in and around Oswestry. This shortage needs to be met in order to capitalise on economic opportunities and to create “*Strong, diverse and prosperous economy, promoting Shropshire as a business location with a growing enterprise culture.*”<sup>1</sup>

The Core Strategy (CS1: Strategic Approach) identifies a need for 55 – 65 hectares of employment land in the spatial areas of North West of Shropshire which includes Oswestry.

To address the identified need and to enable Oswestry to fulfil its role as a centre for major development in Shropshire, 45 hectares of employment land was allocated for development in Oswestry during the period 2006 – 2026 in Shropshire Council's Site Allocations and Management of Development Adopted Plan (SAMDev) (adopted 17 December 2015).

This Proposed Development would deliver 18 hectares of the overall 23ha allocated as employment land at this location by policy S14.1b (ELR072) and contribute towards the delivery aspirations of employment land by 2026.

## **2 Is there 'no satisfactory alternative'?**

No.

The Site Allocations and Management of Development Plan (SAMDev) (2015), was adopted by Shropshire Council in 2015. Policy S14.1b (allocated Employment Sites) allocates land at Mile End East (ELR072) and states development must contribute *"Development subject to access off and improvements to the A5/A483 trunk road junction, contributions towards sustainable transport improvements associated with the site, and provision of pedestrian and cycle links across the A5 to the proposed Eastern Gateway Sustainable Urban Extension, and landscape buffers to the A5. Drainage/flood alleviation measures require a specific Flood Risk Assessment to investigate flood risk across the site to accommodate the proposed development within the developable area of the site."*

Alternative development sites were considered during the plan making process, and this site was identified as suitable and essential to supply employment land to support the growth of Shropshire.

## **3 Is the proposed activity 'not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range'?**

The applicants have obtained two Impact Assessment and Conservation Payment Certificates (IAPC) from Natural England. One for the full application elements, the other for the outline application elements, therefore confirming their acceptance to enter into the Natural England run district level licensing (DLL) scheme in Shropshire for great crested newt (GCN) which both the applicant and Natural England have signed to agree to enter the DLL scheme, and a copy of which has been received by the Local Planning Authority.

The Shropshire GCN DLL scheme allows for a strategic approach to ensure that the favourable conservation status of GCN in their natural range is maintained. This is through payment of a conservation payment that allows for the impacts on GCN (through a planning application) to be adequately compensated.

It is therefore considered that the proposals will not be detrimental to the maintenance of the population of GCN at a favourable conservation status in their natural range.

The 'three tests' must be satisfied in all cases where a European Protected Species may be affected by a planning proposal and where derogation under Article 16 of the EC Habitats Directive 1992 would be required, i.e. an EPS licence to allow an activity which would otherwise be unlawful.

In cases where potential impacts upon a European Protected Species can be dealt with by appropriate precautionary methods of working which would make derogation unnecessary (since no offence under the legislation is likely to be committed), it is not necessary to consider the three tests.

The planning case officer should consider tests 1 (overriding public interest) and 2 (no satisfactory alternative). Further information may be required from the applicant/developer/agent to answer these tests. This should not be a burdensome request as this information will be required as part of the Natural England licence application. If further information is required, it can be requested under s62(3) of the Town and Country Planning Act 1990.

Test 3 (favourable conservation status) will be considered by SC Ecology, with guidance from Natural England.

A record of the consideration of the three tests is legally required. This completed matrix should be included on the case file and in the planning officer's report and should be discussed and minuted at any committee meeting at which the application is discussed.

As well as the guidance provided below, pages 6 and 7 of the Natural England Guidance Note, *Application of the Three Tests to Licence Applications*, may assist the planning officer to answer tests 1 and 2.

### **Answering the three tests**

#### **Test 1**

Is the development 'in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment'?

**Preserving public health or public safety** must also be shown to constitute a reason of **overriding public interest**. You need to demonstrate that action is required to alleviate a clear and imminent danger to members of the general public, e.g.:

1. If an unstable structure (e.g. a building or tree) is involved, either through neglect or outside influences (e.g. severe weather or seismic events), supporting evidence from an appropriately qualified person such as a structural engineer, arboriculturalist or tree surgeon should be sought.
2. If vandalism or trespass is used as an argument, evidence of reasonable measures to exclude the general public from the site must be presented. Evidence may be provided by the local police or fire services in relation to the number of incidents dealt with.

#### **Imperative reasons of overriding public interest**

Only public interests can be balanced against the conservation aims of the EC Habitats Directive (1992). Projects that are entirely in the interest of companies or individuals would generally not be considered covered.

### **Test 2**

Is there 'no satisfactory alternative?'

An assessment of the alternative methods of meeting the need identified in test 1 should be provided. If there are any viable alternatives which would not have an impact on a European Protected Species, they must be used in preference to the one that does. Derogations under the EC Habitats Directive (1992) are the last resort.

Where another alternative exists, any arguments that it is not satisfactory will need to be convincing. An alternative cannot be deemed unsatisfactory because it would cause greater inconvenience or compel a change in behaviour.

This test should identify a) the problem or specific situation that needs to be addressed, b) any other solutions, and c) whether the alternative solutions will resolve the problem or specific situation in (a).

### **Test 3**

Is the proposed activity 'not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range?'

Assessment of the impact of a specific development will normally have to be at a local level (e.g. site or population) in order to be meaningful in the specific context.

Two things have to be distinguished in this test: a) the actual conservation status of the species at both a biogeographic and a (local) population level; and b) what the impact of the proposal would be.

In such cases where the conservation status is different at the different levels assessed, the situation at the local population level should be considered first, although ultimately both should be addressed.

No derogation under the EC Habitats Directive (1992) can be granted if the proposal would have a detrimental effect on the conservation status or the attainment of favourable conservation status for a European Protected Species at all levels. The net result of a derogation should be neutral or positive for a species.

In the case of the destruction of a breeding site or resting place it is easier to justify derogation if sufficient compensatory measures offset the impact and if the impact and the effectiveness of compensation measures are closely monitored to ensure that any risk for a species is detected.

Compensation measures do not replace or marginalise any of the three tests. All three tests must still be satisfied.

<b>Item No.</b>	<b>Application No</b>	<b>Originator</b>
8	21/01334/EIA	Case Officer
Attached above are the comments from SC Planning Ecology. indicating no objections to the proposal subject to conditions (as set out), being attached to any approval notice issued. Also attached is a copy of European protected species three tests matrix, which it is considered raises no significant concerns in relation to		

protected species on site. All the recommended conditions as set out in the Ecology response above other than the first condition in relation to great crested newts are covered in the conditions as set out in appendix one attached to the report. It is recommended that the great crested newt condition is also attached to these.

On ecological issues the application is considered acceptable and in accordance with the policies as set out in paragraph 6.4.7 in the report and the recommendation to this application remains as set out at the start of the report with the inclusion of the great crested newt condition as discussed.

Item No.	Application No	Originator
8	21/01334/EIA	Shropshire CPRE

Letter of objection received from Shropshire branch of CPRE which members will all be aware of having been copied into the email containing the objection that was received on Monday evening. (5<sup>th</sup> July).

## 1. Introduction and summary

1. The whole ethos of this application is to provide jobs. That provision should be in line with other Shropshire Council policies, chief of which are:
  - The Development Plan
  - The Economic Growth Strategy
  - The declaration of a Climate Emergency.
2. Our analysis below indicates that insufficient information is contained in the documents submitted to show that the application is compliant with these policies and that therefore the application should not be approved until such further information is adequately supplied.
3. We have corresponded directly with Mrs Joe Bubb, the applicant on behalf of Shropshire Council, to try to obtain some of this information, without success.
4. This is an application by Shropshire Council to Shropshire Council, and it is disappointing that some of the supporting documentation appears to be inadequate, a fact that has not been brought out in the Development Management Report.
5. We apologise for this late representation due to resource limitations.

## 2. The stated information about jobs is internally inconsistent

1. The Development Management Report (Public Reports Pack page 121, paragraph 6.7.1, second bullet point) states that:
 

*“The key socio-economic benefits of the development include: The creation of an estimated 81 net jobs during the construction phase, and 1,297 net jobs during the operational phase. This represents a total net GVA of £41,726,271 per annum during the construction phase and £322,109,787 during the operational phase”.*
2. These figures appear to have been derived from paragraphs 4.1.5 and 4.1.7 of WSP’s 29-page Socio-Economic Benefits Statement, which stated:
 

4.1.5: *“It is estimated that during the operational phase, the 871 gross jobs created at the Proposed Development (see below) represent GVA of £235,251,502 per annum during the*

operational phase. Net employment generation amounts to 1,297 jobs and represents GVA of £322,109,787”.

4.1.7: “By applying an average benchmark of £63,625 GVA per construction employee in Shropshire, and £4,581,123 GVA per construction employee in the West Midlands, it is anticipated that the estimated 81 net construction jobs generated by the Proposed Development represent an additional £4,619,175 GVA to the Shropshire economy, and an additional £37,107,096 GVA to the West Midlands economy. This represents a total net GVA of £41,726,271 per annum during the construction phase”.

3. There is something about these figures which doesn't look right and we ask the simple questions:
  - a. Will this employment site deliver the number of jobs that other policies appear to have promised?
  - b. Do the GVA numbers “stack up”?

### **Numbers of jobs and utilisation of the site**

4. Conflicting figures have been published about the numbers of jobs to be generated. Shropshire Council, ahead of the consultation in December 2020, said that only 460 jobs would be generated<sup>[1]</sup>. The present application form itself says that only 727 full-time equivalent jobs will be created<sup>[2]</sup>. The information in the applicant's own Socio-Economic Benefits Statement implies it will be about 961 jobs (see Table 1 below). The information in section 2 above says it will be 1,297 jobs. The calculations used by Shropshire Council in the Draft Plan which is due to go to Full Council later this month suggest that the 18.22 Ha site should provide 1,725 jobs<sup>[3]</sup>.
5. The applicant's stated estimate of jobs, at 1,297, is only 75% of the expected figure of 1,725 in the Development Plan. If the figure of 961 (as in Table 1 below) is used then there would be only 56% of expected jobs.
6. It would have been helpful if the Development Management Report had drawn attention to these conflicting figures. Members of the Northern Planning Committee would be justified in asking for better explanations about the suggested employment numbers before approving the present application.
7. The application form (section 17 on page 7) states that the “*Total gross new internal floorspace proposed (including changes of use) (square metres)*” is 497,000. Supporting information makes it clear that the figure of 497,000 is in fact square feet, not square metres. The total employment space is therefore 46,173 sq m, or 4.62 Ha. That represents only 25% of the total site, rather than the 40% expected in the Development Plan<sup>3</sup>.
8. Again, it would have been helpful if the Development Management Report had drawn attention to these anomalous figures. Members of the Northern Planning Committee would be justified in asking for better explanations about the apparent severe under-utilisation of this important employment site.

### **3. The sort of jobs promised by the Economic Growth Strategy, and GVA**

1. Paragraph 3.109 on page 54 of the last consultation version of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 states that:

Shropshire set out its economic growth vision in the Shropshire Economic Growth Strategy 2017 to 2021 that seeks “*To be the best place to do business and invest, renowned for its pool of local talent and expertise. We will strive to maximise our economic potential and increase productivity by fully utilising the benefits of our special environment and high-quality assets*”.

2. There does not seem to be anything within the documentation for this application to explain how this promised increased productivity in jobs might be brought about.
3. In an attempt to make sense of all the conflicting figures, we have brought together information provided within the applicant’s Socio-Economic Benefits Statement to provide the following Table of employment figures:

**Table 1: Employment figures**

4. The information in the Socio-Economic Benefits Statement does not agree precisely with what is shown in the application form but is close. The employee density (i.e. the number of square metres required per employee) is taken from paragraph 4.1.9 of the Socio-Economic Benefits Statement, although in that paragraph the numbers are confusingly stated the wrong way round, as numbers of employees per square metre. The GVA per employee of £19,223 is taken from the latest ONS tables available from [Regional gross value added \(balanced\) per head and income components - Office for National Statistics \(ons.gov.uk\)](#) (which is reference 7 of the Socio-Economic Benefits Statement).
5. WSP’s GVA figures quoted in paragraph 2.2 above are not adequately referenced, nor is there any explanation for the huge disparity between the figures of £63,625 per construction employee in Shropshire, and £4,581,123 GVA per construction employee in the West Midlands. The plain evidence from the ONS tables is that these WSP figures are simply wrong. The annual GVA during the operational phase appears to be only about £18.4 million rather than the £322 million claimed.
6. Again, it would have been helpful if the Development Management Report had not taken these WSP figures at face value but had attempted some critique of the obviously strange figures. Members of the Northern Planning Committee would be justified in asking for better explanations about these GVA figures.
7. It is notable that about 40% of the proposed employment space is to be occupied by storage and distribution uses. These are amongst the least productive uses in terms of productivity. This is not in accordance with the aims of the Economic Growth Strategy to “*maximise our economic potential and increase productivity*”.
8. It would also be instructive, for comparison purposes, to know the overall area, employment floorspace, and number of FTE jobs provided on the existing nearby industrial estates the other side of the Mile End roundabout, to the NE of the A483.

#### 4. Climate change

1. Following Shropshire Council's declaration of a Climate Emergency in May 2019 the Council resolved that every decision it made would take account of Climate Change factors. It is therefore disappointing that the Development Management Report makes no assessment of, or even reference to, the Carbon Calculations for the application.
2. The only information that has been published is contained in Appendix 14.1 of the Environmental Statement, the Embodied Carbon Calculations. However, this is limited to two pages of charts, with no supporting detailed calculations or references. It also provides charts only for the proposed employment uses within the outline application. No calculations are provided for the matters within the full application.
3. By scaling from the charts provided at Figure A-2 of Appendix 14.1 (the Whole life carbon assessment) it appears that the total CO<sub>2e</sub> emissions are about 17,200 tonnes, although nowhere is this stated in the submitted papers. At paragraph 4.1.2 on page 14 of the Non-Technical Summary (Volume 4 of the ES) it is claimed that *"for the Proposed Development, greenhouse gas emissions throughout the lifecycle have been estimated to contribute 0.000006% in the UK Fifth Carbon Budget"*.
4. Our attempt to verify this figure produces markedly different results. The UK Fifth Carbon Budget is set at 1,725MtCO<sub>2e</sub> for the period 2028-2032 (the UK Sixth Carbon Budget published in December 2020 is yet more ambitious). 17,200 tonnes is about 0.001% of this figure, which is some 166 times greater than the stated WSP percentage figure. However, as noted at paragraph 4.2 above, the 17,200 tonnes does not include any figures for the matters within the full application, which may amount to the same again.
5. Furthermore, the comparison of the emissions from the Innovation Park with those for the whole of the UK is deliberately misleading. For instance, for balance, the number of jobs created should also be stated as a percentage of total UK jobs, which would be an equally miniscule amount. The point is that the development will create significant new greenhouse gas emissions at a time of Climate Emergency, when Shropshire Council is leading the way toward Zero Carbon emissions.
6. Again, it would have been helpful if the Development Management Report had included some analysis of the Carbon Calculations. Members of the Northern Planning Committee would be justified in asking for better explanations about these figures.

#### 5. Conclusion

1. For all the above reasons we conclude that, before this application can be approved, and in order to ensure compliance with the Development Plan, the Economic Growth Strategy and the Climate Emergency, Members of the Northern Planning Committee would be justified in asking for further explanations about:
  - a. the conflicting information about job numbers;

- b. the apparent severe under-utilisation of the site;
- c. the low productivity of the jobs on offer;
- d. the anomalous GVA figures claimed; and
- e. the carbon calculations.

Item No.	Application No	Originator
8	21/01334/EIA	Case Officer
<p>In response to the letter of objection from Shropshire branch of the CPRE as referred to above, Officers consider that in consideration of concerns about carbon footprint the application site is allocated for employment in the local plan and this application is mostly in outline and the reality is we don't know who will be the actual end users of the individual units yet, and as such Officers have not given much planning weight to the finer detail on economic benefits as outlined in the applicants' submission on this matter. Clearly there are economic benefits as a result of the proposal and these are outlined in the Officer report.</p> <p>The full element of the application is in relation to necessary on-site infrastructure to enable the development and not in consideration of individual end users on individual employment sites.</p> <p>In response to concerns with regards to carbon footprint and climate change, which is acknowledged is an important issue, whilst the contribution of the scheme to the UK's performance will be very small, it is important to understand what the full carbon impact of the scheme will be (or make a commitment to measuring this once sufficient information is available) and then outline the carbon management and climate resilience measures which have been, or will be deployed to mitigate this impact. This is the basis of the approach which has been established in relation to a 'climate change and carbon appraisal' to be used by Shropshire Council. However, in this instance the application all be it a 'Hybrid' is mainly in Outline format and as such the end users of the units on site are not known at this stage. It is considered the application complies with relevant adopted local plan policies on this matter. Current local plan planning policy in the local plan do not require calculations of carbon footprint and subsequent calculations.</p>		