

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	DOMINICK VEASEY, NEXUS PLANNING LIMITED
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

PLEASE REFER TO THE ATTACHED SHEETS

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

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- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TO EXPAND ON THE MATTERS COVERED WITHIN OUR REPRESENTATIONS

(Please continue on a separate sheet if necessary)

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Signature:

D J VEASEY

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Local Plan

Policy DP1: Residential Mix

1. These representations have been submitted on behalf of Lands Improvement Holdings (LIH) who has land interests at the South Shrewsbury Strategic Urban Extension (SUE). LIH is a strategic land development company operating throughout the UK. LIH obtained outline planning permission for a mixed use development on the site in 2014 and completed an infrastructure contract of £1.89m to service the first residential development parcels. The first phase of construction commenced in 2017.
2. Within the context of LIH's land interests at Shrewsbury representations have been submitted to policies SP2, SP12, SP13, SP16 and DP1. These representations should be considered collectively.
3. On sites of 50 or more dwellings, Policy DP1(6) requires an appropriate range of specialist housing designed to meet the diverse needs of older people. The policy specifically refers to age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care, and/or residential care homes and nursing homes will be provided.
4. However, it is important to ensure that specialist housing is appropriately delivered where needs and demands arise. Indeed, national research prepared by the Associated Retirement Community Operators (ARCO) identified a 10-km (6-mile) market catchment radius from later living / specialist care facilities. This 10-mile zone representing a catchment area within which circa 69% of extra care housing residents have travelled from their last place of residence.
5. In view of this, the proposed blanket approach that all sites of 50 or more dwellings should provide specialist later living housing is unjustified could result in the delivery of facilities in the wrong locations to meet housing needs and location preferences. The location of specialist housing accommodation should be informed by evidence of localised housing needs and existing supply as opposed to large site location.

Recommended Change

6. To ensure that the location and delivery of specialist housing designed to meet the diverse needs of older people is 'justified' and 'effective' to meet arising needs over the plan period the following policy wording change is recommended:

Policy DP1

1. Unless robust evidence is provided demonstrating there is no localised need and demand,
~~On sites of 50 or more dwellings:~~
 - a. An appropriate range of specialist housing designed to meet the diverse needs of older people, such as: age-restricted general market housing; retirement living or

sheltered housing; extra care housing or housing-with-care; and/or residential care homes and nursing homes will be provided.

- b. An appropriate range of specialist dwellings to meet the needs of those with disabilities and special needs will be provided.*

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Part B: Representation

Name and Organisation:	DOMINICK VEASEY, NEXUS PLANNING LIMITED
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- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
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- (Please tick one box)

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Paragraph: Policy: Site: Policies Map:

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- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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- Yes, I wish to participate in hearing session(s)

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Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Signature: D J VEASEY

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Local Plan

Policy SP2: Strategic Approach

1. These representations have been submitted on behalf of Lands Improvement Holdings (LIH) who has land interests at the South Shrewsbury Strategic Urban Extension (SUE). LIH is a strategic land development company operating throughout the UK. LIH obtained outline planning permission for a mixed use development on the site in 2014 and completed an infrastructure contract of £1.89m to service the first residential development parcels. The first phase of construction commenced in 2017.
2. Within the context of LIH's land interests at Shrewsbury representations have been submitted to policies SP2, SP12, SP13, SP16 and DP1. These representations should be considered collectively.
3. Policy SP2 (2) outlines that over the Local Plan period from 2016 to 2038 ("the plan period"), around 30,800 new dwellings and 300 ha. of employment land will be delivered. This equates to around 1,400 dwellings per annum (dpa) and 14 ha. of employment land per annum.
4. As confirmed within the pre submission Local Plan supporting text, the housing figure of 1,400 dpa is higher than the Standard Method minimum requirement (1,177 dpa or 25,894 dwellings over the plan period). For the reasons summarised within Local Plan supporting text (paragraph 3.6), we support the approach of planning to deliver more than the Standard Method minimum. Indeed, this approach is supported by the National Planning Policy Framework (NPPF), namely paragraphs 11 and 59 and the Planning Practice Guidance (PPG), namely ID 2a-010.
5. However, whilst we support the need to plan for a higher housing need figure than the Standard Method to facilitate, amongst other things, diversification of the labour force and wider aspirations, including increased economic growth and productivity' (Supporting text, paragraph 3.6(d). and 3.6(e)), we are concerned that there is currently a very fundamental misalignment between planned housing growth (1,400 dpa) and planned employment land growth (14 ha. of employment land per annum).
6. The Shropshire Economic Development Needs Assessment Interim Report, December 2020 ("the Interim SEDNA") confirms (Table 8.17) that the level of employment land growth required over the plan period to balance jobs and housing is 142.83 ha. (6.49 ha. per annum). Importantly, it is noted that the employment land requirement figures within the Interim SEDNA apply flexibility and churn / replacement of lost stock uplifts.
7. The level of planned employment land growth (14 ha. per annum) is therefore over double that required to support planned housing growth (6.49 ha. per annum). Against NPPF paragraph 35, the level of proposed employment land growth fails to therefore be either 'justified' or 'effective'. To balance jobs and housing growth over the plan period, the planned level of housing growth must significantly increase, and / or the level of planned employment land growth must significantly reduce.

8. Current housing and job growth misalignment is likely result in unsustainable commuting patterns into Shropshire as there will be insufficient homes within the district to meet the needs of the increased and diverse workforce. The level of planned housing and employment land growth over the plan period therefore appears to have consequential cross boundary strategic implications. It is noted that the consultants who prepared the Interim SEDNA on behalf of the Council (Lichfields) raised this misalignment issue with the Council (paragraph 9.10):

“If the housing requirement is at, or below, the 1,400 dpa under labour supply scenario 4 then this could have repercussions on the employment land target, which may have to be reduced as a consequence to ensure the two are not misaligned. It is strongly recommended that, in these circumstances, the Council undertake more detailed housing modelling to ensure the job projections are aligned closely with their housing requirement.”

9. Despite the ‘strong’ Interim SEDNA recommendation, no further detailed housing modelling appears to have been undertaken by the Council.

10. In addition to testing a labour supply scenario associated with 1,400 dpa, the Interim SEDNA also assessed four other employment land forecast scenarios, these being:

- 1) Baseline employment forecasts (Experian’s Local Market Quarterly Forecasts).
- 2) Regeneration-led econometric model (Marshes LEP’s Strategic Economic Plan 2019, and key infrastructure projects).
- 3) Local Labour Supply (1,177 dwellings per annum (dpa), current Standard Method).
- 4) Past take up trends.

11. As summarised below, the planned level of employment land growth is very significantly greater than all tested scenarios. With the exception of past take up trends (which itself is meaningfully higher) the level of planned employment land growth (14 ha. rounded) is broadly double that justified by the Council’s evidence base.

Scenario	All Employment Land (ha. per annum)	Planned Employment Land (ha. per annum)	Difference between projected* and planned	
Baseline: Experian June 2020	7.33	13.64	6.31	86%
Regeneration	7.55		6.08	81%
Labour Supply 1,177 dpa	6.01		7.63	127%
Labour Supply 1,400 dpa	6.49		7.14	110%
Past take up trends	10.63		3.01	28%

*Projected figures include a flexibility and churn / loss replacement factors.

12. To meet economic projections (projections prepared by one of the main forecasting houses, Experian) and regeneration objectives and commitments set out within the Marshes LEP Strategic Economic Plan, planned employment land growth over the plan period should be circa. 7.6 ha. per annum (166 ha. over the plan period). Even at this level of employment land growth, the Council would also need

to prepare further housing modelling as a requirement greater than 1,400 dpa would again be necessary to appropriately align jobs and housing.

13. Whilst the testing of a past take up trend scenario is credible in principle, it clear that the past trend scenario is significantly higher than the labour supply, latest economic projections, and regeneration priorities and commitment scenarios. Given this, the credibility of the past trend scenario is highly questionable, particularly in a post-Covid19 context where working practices and demand for employment space are likely to have permanently changed from pre-Covid19 trends.
14. Notwithstanding this, even if a past trend employment land growth scenario was accepted (which we do not accept), the level of planned employment land growth (14 ha. rounded per annum) is still very meaningfully higher than would be justified (10.63 ha. per annum). The Council would again need to prepare further housing modelling as a requirement greater than 1,400 dpa would again be necessary to appropriately align jobs and housing.
15. Given the above, we are firmly of the view that the level of planned employment land growth over the plan period that is justified by the Council's evidence base is at best 166 ha. (7.6 ha. per annum). This figure would increase to 196 ha. over the plan period (8.9 ha.) once the agreed unmet employment land needs arising from the Black Country authorities is factored in (30 ha.).
16. Policy SP2 and associated supporting text, should accordingly amended to reflect this. To support this level of employment land growth, further housing modelling is necessary given that a housing figure greater than 25,894 dwellings over the plan period (1,400 dpa) would be required. The housing requirement figure within Policy SP2 and associated supporting text should accordingly be amended to reflect the outcome of the housing modelling.
17. The Council's monitoring data confirms that housing completions in excess of 1,400 dpa is wholly deliverable (an average of 1,637 completions per annum over the past 5 reported years (2014/15 to 2018/19) and an average of 1,876 completions per annum of the past 3 reported years (2016/17 to 2018/19).
18. Any additional housing growth associated with ensuring that jobs and housing growth is aligned, should, in accordance with the overarching Local Plan spatial strategy, be focused at the districts higher order settlements, such as Shrewsbury. Given the very significant over supply of employment land (the Interim SEDNA outlines that the employment land supply position is currently 410 ha.), undeveloped allocated / approved employment land, such as that associated with the South Shrewsbury Strategic Urban Extension (SUE), should be released for residential-led mixed development to meet the additional housing land required.
19. The allocated employment land associated with the South Shrewsbury SUE has been actively marketed since outline planning permission was granted in 2014. However, little commercial interest has come forward over the past seven years. As highlighted within the Council's Employment Land Review, December 2019, new employment land take up is stronger at or around established employment sites which have direct or good access to the strategic road network. Key established employment sites at

Shrewsbury include Harlescott to the north and Shrewsbury Business Park to the south east. The South Shrewsbury SUE is not an established location for employment uses, nor does it have direct access onto the strategic road network.

Recommended Change

20. Undertake further housing modelling to determine the housing requirement necessary to align with job growth associated with the latest economic projections, and regeneration priorities and commitments (employment land growth of 7.6 ha per annum / or 8.9ha once neighbouring authorities unmet needs are taken into account). Amend the housing figure as appropriate within the Local Plan and allocate additional land for housing development.
21. Decrease the level of planned employment land growth to 7.6 ha. per annum / or 8.9 ha. per annum once unmet needs arising from the Black County authorities is taken into account. This level of employment land growth is the level the supported and justified by the Council's evidence base.
22. Given the very significant over supply of employment land within Shropshire, reallocate undeveloped / approved employment land, such as that associated with the South Shewsbsury SUE to help meet market and affordable housing needs.

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Name and Organisation:	DOMINICK VEASEY, NEXUS PLANNING LIMITED
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Q1. To which document does this representation relate?

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- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP12"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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- No, I do not wish to participate in hearing session(s)
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Signature: D J VEASEY

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Local Plan

Policy SP12: Shropshire Economic Growth Strategy

1. These representations have been submitted on behalf of Lands Improvement Holdings (LIH) who has land interests at the South Shrewsbury Strategic Urban Extension (SUE). LIH is a strategic land development company operating throughout the UK. LIH obtained outline planning permission for a mixed use development on the site in 2014 and completed an infrastructure contract of £1.89m to service the first residential development parcels. The first phase of construction commenced in 2017.
2. Within the context of LIH's land interests at Shrewsbury representations have been submitted to policies SP2, SP12, SP13, SP16 and DP1. These representations should be considered collectively.
3. We support the overarching principle of Policy SP12, which seeks to support and encourage economic growth within Shropshire over the Local Plan period ("the plan period"). We also support Shrewsbury being the primary focus for growth and investment to ensure that its role and function as the County Town and Strategic Centre protected and maintained.
4. However, as set out in detail within our representations to Policy SP2, to meet economic growth projections (projections prepared by one of the main forecasting houses, Experian) over the Local Plan period and regeneration objectives and commitments set out within the Marshes LEP Strategic Economic Plan, a housing figure greater than 1,400 dwellings per annum (dpa) is necessary.
5. The Shropshire Economic Development Needs Assessment Interim Report, December 2020 ("the Interim SEDNA") outlines that a housing requirement of 1,400 dpa would accommodate sufficient workforce growth to support employment land growth of 6.49 hectares per annum. However, employment land growth of 7.6 hectares per annum would be required to meet economic growth projections and regeneration objectives and commitments.
6. To therefore ensure that Policy SP12 is 'justified' and 'effective' (National Planning Policy Framework (NPPF), paragraph 36), further housing modelling to ensure that housing growth aligns with the Shropshire economic growth strategy must be undertaken and the housing requirement contained within the Local Plan accordingly uplifted.
7. Any additional housing growth associated with ensuring that jobs and housing growth is aligned, should, in accordance with the overarching Local Plan spatial strategy, be focused at the districts higher order settlements, such as Shrewsbury. Given the very significant over supply of employment land (the Interim SEDNA outlines that the employment land supply position is currently 410 ha.), undeveloped allocated / approved employment land, such as that associated with the South Shrewsbury Strategic Urban Extension (SUE), should be released for residential-led mixed development to meet the additional housing land required.

8. The allocated employment land associated with the South Shrewsbury SUE has been actively marketed since outline planning permission was granted in 2014. However, little commercial interest has come forward over the past seven years. As highlighted within the Council's Employment Land Review, December 2019, new employment land take up is stronger at or around established employment sites which have direct or good access to the strategic road network. Key established employment sites at Shrewsbury include Harlescott to the north and Shrewsbury Business Park to the south east. The South Shrewsbury SUE is not an established location for employment uses, nor does it have direct access onto the strategic road network.

Recommended Change

9. Undertake further housing modelling to determine the housing requirement necessary to align with job growth associated with the latest economic projections, and regeneration priorities and commitments (employment land growth of 7.6 ha per annum / or 8.9ha once neighbouring authorities unmet needs are taken into account). Amend the housing figure as appropriate within the Local Plan and allocate additional land for housing development.
10. Decrease the level of planned employment land growth to 7.6 ha. per annum / or 8.9 ha. per annum once unmet needs arising from the Black County authorities is taken into account. This level of employment land growth is the level the supported and justified by the Council's evidence base.
11. Given the very significant over supply of employment land within Shropshire, reallocate undeveloped / approved employment land, such as that associated with the South Shrewsbury SUE to help meet market and affordable housing needs.

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Signature:

D J VEASEY

Date:

26/02/2021

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Part A Reference:

Part B Reference:

Shropshire Local Plan

Policy SP13: Delivering Sustainable Economic Growth and Enterprise

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2. Within the context of LIH's land interests at Shrewsbury representations have been submitted to policies SP2, SP12, SP13, SP16 and DP1. These representations should be considered collectively.
3. Policy SP13(1) outlines that around 300 ha. of employment development will be delivered from 2016 to 2038 ("the plan period"). We have set out in detail within our representations to Policy SP2 our fundamental soundness concerns regarding the proposed strategy to deliver 300 ha. of employment land over the plan period. For brevity, our Policy SP2 soundness concerns have not been repeated within these representation. However, our Policy SP2 representations equally apply to Policy SP13 and therefore should be appropriately considered against Policy SP13(1).
4. As set out in detail within our Policy SP2 representations there is a very significant existing level of oversupply of employment land (circa. 410 ha.) within Shropshire. Indeed the Council's employment land evidence base (namely the Shropshire Economic Development Needs Assessment Interim Report, December 2020) highlights this oversupply. In view of this, the Policy SP13(7) presumption to effectively protect all allocated employment land and established employment areas over the plan period appears wholly unjustified, and consequentially unsound against paragraph 35 of the National Planning Policy Framework (NPPF).
5. Given the very significant level of existing employment land supply, the level of employment land protection afforded within Policy SP13(7) should importantly differentiate and prioritise established employment areas over allocated employment land. When assessing proposals for the change of use or loss of employment land, Policy SP13(7) criterion (c) refers to 'other significant Local Plan objectives'. In the absence of the Local Plan setting out any objectives alongside the Spatial Vision, we consider that the delivery of housing and affordable housing should be referenced within criterion (c). Indeed, a key component of the Local Plan Spatial Vision is to ensure access to homes and affordable housing.

Recommended Change

6. Undertake further housing modelling to determine the housing requirement necessary to align with job growth associated with the latest economic projections, and regeneration priorities and commitments (employment land growth of 7.6 ha per annum / or 8.9ha once neighbouring authorities unmet needs are taken into account). Amend the housing figure as appropriate within the Local Plan and allocate additional land for housing development.
7. Decrease the level of planned employment land growth to 7.6 ha. per annum / or 8.9 ha. per annum once unmet needs arising from the Black County authorities is taken into account. This level of employment land growth is the level the supported and justified by the Council's evidence base.
8. Given the very significant over supply of employment land within Shropshire, reallocate undeveloped / approved employment land, such as that associated with the South Shewsbsury SUE to help meet market and affordable housing needs.
9. Amend Policy SP13(7) criterion (c) as set out within the tracked changes below:
 - c. The application demonstrates that the proposed use will make a significant contribution to the local economy, the local community or to other significant Local Plan objectives, such as delivering market and affordable housing.

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	DOMINICK VEASEY, NEXUS PLANNING LIMITED
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP16	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

PLEASE REFER TO THE ATTACHED SHEETS

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE REFER TO THE ATTACHED SHEETS

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TO EXPAND ON THE MATTERS COVERED WITHIN OUR REPRESENTATIONS

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: D J VEASEY

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Local Plan

Policy SP16: Shrewsbury Place Plan Area

1. These representations have been submitted on behalf of Lands Improvement Holdings (LIH) who has land interests at the South Shrewsbury Strategic Urban Extension (SUE). LIH is a strategic land development company operating throughout the UK. LIH obtained outline planning permission for a mixed use development on the site in 2014 and completed an infrastructure contract of £1.89m to service the first residential development parcels. The first phase of construction commenced in 2017.
2. Within the context of LIH's land interests at Shrewsbury representations have been submitted to policies SP2, SP12, SP13, SP16 and DP1. These representations should be considered collectively.
3. We support the overarching principle of Policy SP16, which recognises Shrewsbury as the Strategic Centre for Shropshire and the primary focus of new development in the County. We also support the delivery of at least 8,625 dwellings at Shrewsbury over the Local Plan period (392 dwellings per annum (dpa)). However, we have fundamental soundness concerns over the policy approach towards delivering around 100 ha. of employment land over the plan period (4.5 ha. of employment land per annum).
4. Policy SP2 of the Local Plan outlines that 1,400 dpa and 14 ha. of employment land per annum will be delivered over the plan period. The housing and employment land requirements set out within Policy S16 represent an apportionment of the overarching Policy SP2 requirement. This being around 28% of the overarching housing figure and 32% of the employment land figure.
5. However, as set out in detail within our representations to Policy SP2, to meet economic growth projections (projections prepared by one of the main forecasting houses, Experian) over the Local Plan period and regeneration objectives and commitments set out within the Marshes LEP Strategic Economic Plan, a housing figure greater than 1,400 dwellings per annum is necessary. Consequentially Shrewsbury's apportionment of the overarching housing figure must also be greater than 392 dpa. Additional land for housing at Shrewsbury needs to be identified as part of the Local Plan process.
6. Our representations to Policy SP2 also confirmed that to meet economic growth projections and regeneration objective and commitments over the plan period only 7.6 ha. of employment land per annum is necessary and justified. Consequentially, Shrewsbury's apportionment of the overarching employment land figure (4.5 ha.) is therefore too high and should be accordingly reduced.
7. To assist meeting the additional housing land required at Shrewsbury, undeveloped allocated / approved employment land, such as that associated with the South Shrewsbury Strategic Urban Extension (SUE), should be released for residential-led mixed development.

8. The allocated employment land associated with the South Shrewsbury SUE has been actively marketed since outline planning permission was granted in 2014. However, little commercial interest has come forward over the past seven years. As highlighted within the Council's Employment Land Review, December 2019, new employment land take up is stronger at or around established employment sites which have direct or good access to the strategic road network. Key established employment sites at Shrewsbury include Harlescott to the north and Shrewsbury Business Park to the south east. The South Shrewsbury SUE is not an established location for employment uses, nor does it have direct access onto the strategic road network.