

## 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:	Anglo Beef Processors (ABP) c/o S. Ward Planning Consultants
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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:	<input type="text" value="Various"/>	Site:	<input type="text" value="ABP land"/>	Policies Map:	<input type="text" value="16b"/>
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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 type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input 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.

Refer to submission attached
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*(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.*

Refer to submission attached

*(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 seek the following:**

- 1. The 'Protected Employment Zone' as allocated in the vicinity of the ABP Plant on Battlefield Road should be maintained and strengthened.**
- 2. The Employment Land Allocation north of the ABP Plant (ELR006) should be retained as employment allocation solely for Class B employment uses. There should be no general 'commercial' uses in this designation.**
- 3. An explicit policy reference to ELR006 (Employment land allocation north of ABP) and SHREW09-115 (Housing Land Allocation North of ABP) that access to and use of these new development areas must take full account of existing employment uses and employment allocations to the south, including ABP and not in any way impede or be detrimental to the operational requirements of the ABP Plant, including any aspects of access and egress to the public road network.**

Office Use Only

Part A Reference:

Part B Reference:

(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:

Stephen Ward

Date:

22/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Planning Policy Team Shropshire Council,

Shirehall,

Abbey Foregate Shrewsbury,

Shropshire,

SY2 6ND.

Via e-mail: [Planningpolicy@shropshire.gov.uk](mailto:Planningpolicy@shropshire.gov.uk)

22<sup>nd</sup> February 2021

Dear Sir/ Madam,

**RE: REPRESENTATION BY ANGLO BEEF PROCESSORS (ABP) SHREWSBURY ON THE LOCAL PLAN REVIEW (REG 19 PRE-SUBMISSION DRAFT LOCAL PLAN)**

**1.0 INTRODUCTION**

This is a representation by Anglo Beef Processors (ABP) of Battlefield Road, Harlescott, Shrewsbury SY1 4AH in respect of the Shropshire Local Plan Review (Reg 19 pre-submission draft), and specifically the land allocations within Shropshire Council Policy Map Shrewsbury Area s.16b Inset in and in the vicinity of the ABP plant at Battlefield Road.

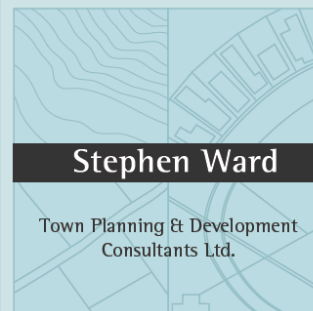
This representation supports the principle of the following aspects of the Plan —

1. The 'Protected Employment Zone' as allocated in the vicinity of the ABP Plant on Battlefield Road.
2. The Employment Land Allocation north of the ABP Plant (ELR006) retained as employment allocation.

This representation also seeks the following:

1. An explicit policy reference to ELR006 (Employment land allocation north of ABP) and SHREW09-115 (Housing Land Allocation North of ABP) that access to and use of these new development areas must take full account of existing employment uses and employment allocations to the south, including ABP and not in any way impede or be detrimental to the operational requirements of the ABP Plant, including any aspects of access and egress to the public road network.

A completed Representations Form is attached.



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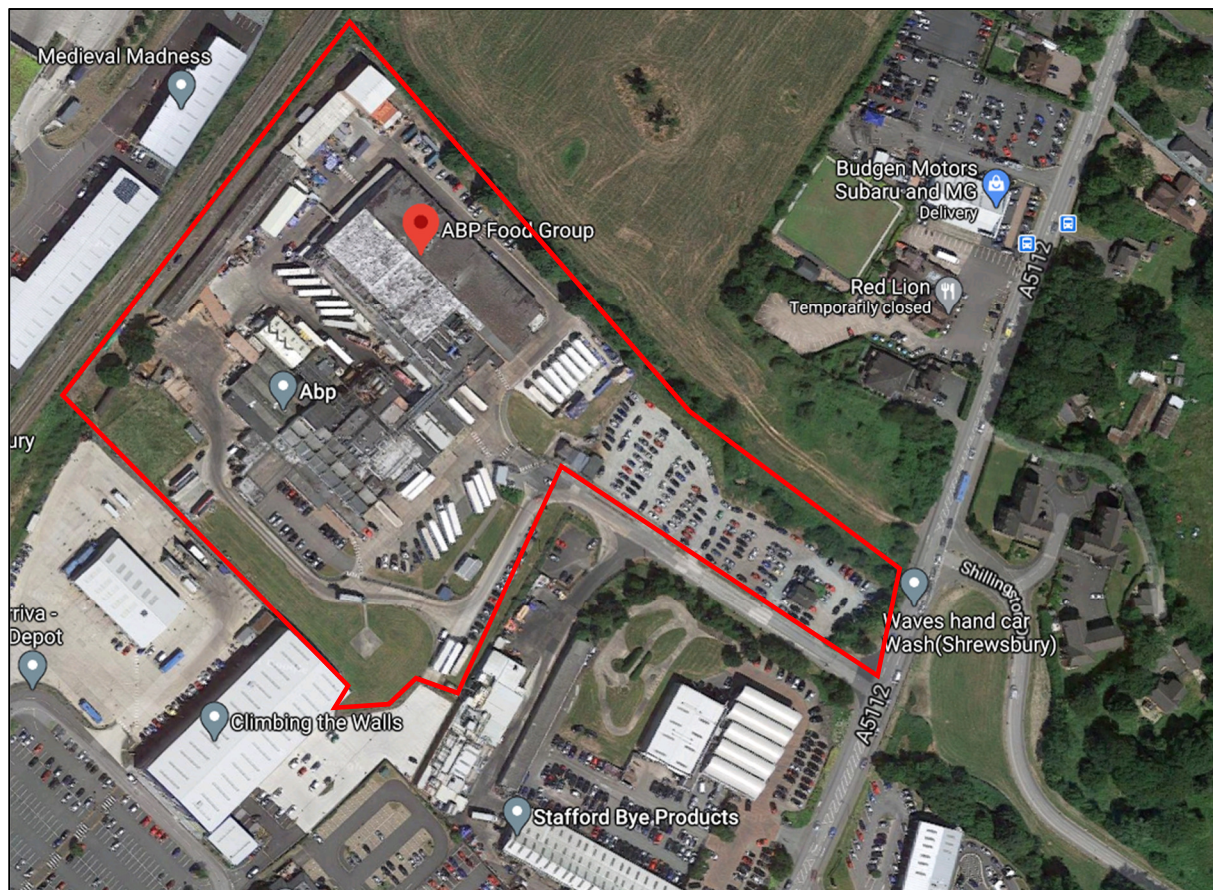
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Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth, Ireland, act on behalf of ABP. Please address all further correspondence in relation to this matter to Stephen Ward Town Planning and Development Consultants at the above address or alternatively via email to [jhorgan@wardconsult.com](mailto:jhorgan@wardconsult.com)

## **2.0 IMPORTANCE OF ABP PLANT TO THE LOCAL AND REGIONAL ECONOMY**

The ABP plant is well established in the area since beginning its operations there in 1989. The site is located to the West of Battlefield Road as shown in Figure 1. The plant is one of the largest employers within the county providing over 500 direct skilled jobs.

According to the Shropshire County Economic "Research and Intelligence Reports" the County is one of principally small businesses with more than 9 out of 10 businesses registered for VAT or PAYE employing few than 10 people in 2016. There are only 35 employers within the county who have a workforce of greater than 250. Although the number of large employers in Shropshire is limited, they account for a disproportionately large share of employment. The ABP plant employees over 500 people directly and the longevity of operation in the area demonstrates its importance to both the local and regional economies.



**Figure 1 — Site Location**

The plant is also crucial for the local rural economy with 3000 farmers registered to supply the facility and so the plant also acts as an important sales outlet for the farming community in areas surrounding Shrewsbury.

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### **3.0 PROPOSED LAND USE ALLOCATIONS MAP**

The Local Plan Review Map continues to allocate the ABP Plant and much of the surrounding area as a 'Protected employment Area', and the land north of the site, ELR006, as a future Employment area. ABP would be in support of these land-use allocations for the reasons outlined below.

#### **ALLOCATED 'PROTECTED EMPLOYMENT AREA' AT BATTLEFIELD ROAD**

ABP made submissions during previous plan-preparation consultation stages expressing its concern regarding the encroachment of non-employment uses and the need to ensure that there is a sufficiently robust policy base to protect this important local and regional employer. In this regard the Company supports the plan provisions with respect to the 'Protected Employment Area' at Battlefield Road. Nevertheless, ABP remains extremely concerned with potential encroachment of non-employment uses towards its Plant. Amongst the reasons for this concern is the potential for future conflict due to non-compatible land-uses encroaching on the Plant. ABP considers non-compatible land-uses to include uses that attract significant numbers of the general public to the area and would include uses such as restaurants, retailing, car-showrooms and hotels. As previously stated, ABP is a very important employment provider in the area and it is fundamental to ensure this employment is retained.

#### **EMPLOYMENT LAND ALLOCATION NORTH OF ABP PLANT**

ABP previously made submissions in respect of potential land use allocations to the north of its Battlefield Road Plant during the evolution stages of the SAMDev Plan. In this regard, the Company supports the proposed employment land-use allocation north of the ABP Plant (ELR006).

ABP requests that any proposed access to Battlefield Road from the ELR006 land allocation would be such as to not impede any traffic movements to or from the ABP facility as the access / egress to the ABP facility is only a short distance to the south of these new land-use allocations and the Company is conscious of the number of junctions onto this section of Battlefield Road.

#### **HOUSING LAND ALLOCATION NORTH OF ABP PLANT**

ABP does not object to the new housing allocation SHREW095-115 but requests development proposals in this area, including access, design of dwellings and layout of development proposals should be such as not to impede or cause any detriment to the operational requirements of the ABP Plant.



#### **4.0 POLICY BASIS SUPPORT FOR LAND ZONING**

##### **National Planning Policy**

The National Planning Policy Framework 2018 (NPPF) has as a key aim building a strong, competitive economy. Para. 80 states:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*

##### **Local Planning Policy**

The Adopted Core Strategy 2006-2026 supports the objective of encouraging economic growth in the region. Policy CS13 confirms the importance of food and drink production and processing. The continued 'Employment Protection Area' and the employment allocation to the north of the ABP Plant are consistent with this adopted Core Strategy policy and positively support this policy objective.

CS13 also reinforces the importance of supporting local farmers:

*"In rural areas, recognising the continued importance of farming for food production and supporting rural enterprise and diversification of the economy, in particular areas of economic activity associated with agricultural farm diversification, forestry, green tourism and leisure, food and drink processing, and promotion of local food supply chains."*

The continued allocation of the ABP Plant and surrounding lands as a 'Protected Employment Area' will be complementary to the regional and local planning objectives.

**5.0 CONCLUSION**

ABP supports the continued allocation of lands as 'Employment Protection Area' and new employment development area designation ELR006.

ABP submits as follows —

1. The 'Protected Employment Zone' as allocated in the vicinity of the ABP Plant on Battlefield Road should be maintained and strengthened.
2. The Employment Land Allocation north of the ABP Plant (ELR006) should be retained as employment allocation solely for Class B employment uses. There should be no general 'commercial' uses in this designation.
3. An explicit policy reference to ELR006 (Employment land allocation north of ABP) and SHREW09-115 (Housing Land Allocation North of ABP) that access to and use of these new development areas must take full account of existing employment uses and employment allocations to the south, including ABP and not in any way impede or be detrimental to the operational requirements of the ABP Plant, including any aspects of access and egress to the public road network.

Yours faithfully,

**Stephen Ward**