

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0629
Matter	4
Relevant questions nos	7 (best fit)

Q7. Is the preferred “balanced growth” approach and the resulting employment land requirement set out in Policy SP2 of around 300 hectares (14ha per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

SUBMISSION

POINT A – Definition of ‘employment land’

1. We would welcome a clear definition of ‘employment land’ for the reasons given below. Neither the NPPF or the Draft Local Plan given any definition, despite it being mentioned 68 times in the latter. Some research into other Local Authority planning activities suggests that each LA takes its own approach here.

We feel that there is a risk of the term ‘employment land’ being erroneously conflated with ‘business and industrial land/premises’ land use designations and values, which we are sure is not intended.

2. Our specific concern lies in the provision of renewable energy generation, as called for by the national Strategic Energy policy and the NPPF. Historically, energy generation was confined to localised premises such as a power station. There is no serious argument that these should not be considered as placed on ‘employment land’.

However, renewable energy systems may call for large areas of land to be put into use as locations for solar farms or other renewable energy systems. Such use may not be exclusive and the land may still offer other benefits such as enhancing biodiversity.

3. A lot of the settlement hierarchy and planning strategy is based around residential and employment land allocation. If land used for renewable energy is counted as ‘employment land’, this will have two detrimental effects;

- a) the allocated employment land may be 'used up' without generating the level of employment intended, thus negating the effect of the Local Plan and skewing the outcome of the strategy, and
- b) it may be used as a pretext to limit the installation of renewable energy systems.

We therefore request that, in the interest of clarity, a formal definition of 'employment land' applicable to the totality of the Local Plan be added and that such a definition should explicitly exclude "all land used in the production of renewable energy".

SUGGESTED AMENDMENT

At SP2 Para 2. add:

For the avoidance of doubt, 'employment land' excludes areas used for the development and operation of systems producing renewable energy. OR

at a suitable and binding place in the strategy, provide a proper definition of 'employment land' and other land use types referenced in the Strategy that incorporates this definition OR

provide a reference to an external accepted standard that clearly incorporates this definition

POINT B – Promotion of employment creation in green industries

The NPPF for instance:

in para. 152: "...and support renewable and low carbon energy and associated infrastructure. ..."

and

"para. 155. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure)"*

clearly suggests that strong action should be taken to provide low carbon energy source infrastructure and hence, by implication, the land that this infrastructure is placed on and the employment it generates.

The strategy for employment land set out in the SP2 gives no positive support to the opportunities present in low-carbon activity to generate employment, often at a higher skill level.

There is no evidence of consideration of low carbon employment creation opportunities anywhere else in the draft Local Plan. Thus, we consider that SP2 is UNSOUND on the test of ‘... positively prepared...’ and is additionally created internal inconsistency with other strategic policies (e.g. in SP 13 where considerable emphasis is placed on investment).

SUGGESTED AMENDMENT

We consider that this point should be addressed here and, for instance, in SP13:

Revise SP13 as follows:

Add Paragraph 8 as follows:

“To prefer employment development in green industries, particularly those involved in low carbon energy generation and to prioritise employment generation in these industries where there is a choice of other alternatives.”

END