



For Shropshire
Council use

Respondent
no:

Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

**Pre-Submission Draft (Final Plan)
17 March 2014 – 28 April 2014**

Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:

www.shropshire.gov.uk/samdev

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

| | |
|----------------------------------|---|
| Name: | Paul Slater, Senior Planner |
| Organisation (if applicable): | Kemp and Kemp |
| Address: | 1-3 Ock Street, Abingdon on Thames, Oxfordshire OX14 5AL |
| Email: | pslater@kempandkemp.co.uk |
| Telephone: | 01865 240001 |

If you are acting as an Agent, please use the following box to tell us who you are acting for:

| | |
|----------------------------------|----------------------------|
| Name: | Lands Improvement Holdings |
| Organisation (if applicable): | |
| Address: | |
| Email: | |
| Telephone: | |

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

| |
|--|
| Schedule S16.1b Allocated Employment Sites |
|--|

Is your representation in support or objection? (please tick as appropriate)

| | | | | |
|----------------|------------|-------------------------------------|-----------|--------------------------|
| Support | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| Object | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

| | | | | |
|--------------------------|------------|--------------------------|-----------|-------------------------------------|
| Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

| | |
|--|-------------------------------------|
| Positively prepared | <input checked="" type="checkbox"/> |
| Justified | <input checked="" type="checkbox"/> |
| Effective | <input checked="" type="checkbox"/> |
| Consistent with National Policy | <input checked="" type="checkbox"/> |

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

| |
|--|
| <p>Please see attached representations</p> |
|--|

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Please see attached representations

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.



No, I wish to pursue my representations through this written representation.



If you wish to attend the examination, please explain why you think this is necessary in the box below:

Lands Improvement Holdings ("LIH") is in negotiations with landowners to purchase land which forms part of the Shrewsbury South Sustainable Urban Extension (SUE) and is currently preparing a planning application for development which is in accordance with the principles set out in the Council's Adopted Masterplan. LIH, therefore, has a significant interest in the Site Allocations and Management of Development Plan and considers it necessary to attend the examination.

Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

| | |
|---|-------------------------------------|
| When the SAMDev Plan has been submitted for examination | <input checked="" type="checkbox"/> |
| When the Inspector's Report is published | <input checked="" type="checkbox"/> |
| When the SAMDev Plan is adopted | <input checked="" type="checkbox"/> |

Please return this form by 5pm on Monday 28 April 2014

You can e-mail it to:

Planning.policy@shropshire.gov.uk

Or return it to: Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Please note, we will acknowledge receipt of representations made by e-mail.

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.

SHROPSHIRE COUNCIL

**SITE ALLOCATIONS AND MANAGEMENT OF DEVELOPMENT
(SAMDEV) PLAN**

PRE-SUBMISSION DRAFT (FINAL PLAN)

**SUBMISSIONS ON BEHALF
-- OF --
LANDS IMPROVEMENT HOLDINGS**

APRIL 2014



INTRODUCTION

1. This submission is made in response to the Pre-submission Draft Shropshire Site Allocations and Development Management Plan ("SAMDev plan") and is made on behalf of Lands Improvement Holdings ("LIH"). LIH is in negotiations with landowners to purchase land which forms part of the Shrewsbury South Sustainable Urban Extension (SUE) and is currently preparing a planning application for development which is in accordance with the principles set out in the Council's Adopted Masterplan.
2. LIH supports the allocation of the Shrewsbury South SUE in the SAMDev plan and welcomes the support it has received from the Council regarding the bringing forward of proposals to fully deliver the development within the plan period. There are, however, a number of matters arising from the SAMDev plan as drafted on which LIH wish to comment. These are dealt with in the various representations made.

PLAN SECTION: S16 Schedule 16.1b Allocated Employment Sites

SUPPORT OR OBJECT: OBJECT

SOUNDNESS TESTS FAILED: Not effective, not justified and not consistent with national policy

3. Schedule 16.1b proposes to allocate the Shrewsbury South SUE for approximately 26ha of employment land with the development being required to meet the following development guidelines:

"Development to deliver comprehensively planned, integrated and phased development of the SUE having regard to the SUE Land Use Plan (Figure S16.1.1) and adopted masterplan. Development to include provision of a new strategic employment site south and east of the Football Stadium (22 ha.) and Phase 3 of Shrewsbury Business Park off Thieves Lane (4 ha.). The strategic employment site has the potential to accommodate a range of types of business uses (B1, B2 and B8), including recycling and environmental industries."

4. LIH supports the proposed allocation of the site in accordance with the Core Strategy and is bringing forward a planning application for the site to ensure timely delivery within the plan period.
5. The site is suitable for a range of employment generating uses and the development guidelines of Schedule 16.1b. should enable a range of uses to be delivered on the employment land allocation which reflects market demand.
6. The range of employment uses on the site should not be constrained to B class uses and recycling and environmental industries. This is not in accordance with Core Strategy Policies CS13 and CS14, which promote a range of business types through planning and managing a responsive and flexible supply of employment land in accordance with national policy.
7. Core Strategy Policy CS14, in particular, does not restrict the use of employment land to B class uses and recycling and environmental industries. This is made clear in the supporting text to Core Strategy Policy CS14 at paragraph 6.16, which states that:

“6.16 The distribution of the strategic employment land supply is described in Policy CS1 to support the strategic approach. The portfolio will support the provision of important town centre uses in edge of centre and out of centre locations especially in Shrewsbury with its recognised physical constraints where the requirements of Policy CS15 are fully satisfied. Other important land uses including waste infrastructure, important community services and facilities and ancillary uses within employment developments will also be accommodated.”

8. National planning policy as set out in the National Planning Policy Framework (NPPF, paragraph 22) does not afford long term protection to sites allocated for employment use and states that alternative uses should be treated on their merits having regard to market signals and the need for different uses to support sustainable communities.
9. It is further noted that the SAMDev plan proposes a more than adequate supply of employment land to meet the Core Strategy requirement for Shrewsbury. This is confirmed by Table 4.4 of the SAMDev Technical Background Paper (March 2014) which identifies an over allocation of employment land provision against the Core Strategy targets of 8.6ha. There is, therefore, more than adequate provision of land for B class uses in the town.
10. The proposed SAMDev plan at paragraph 4.34 also states that portfolio sites (which includes Shrewsbury South SUE) may be treated flexibly, especially where sites are undeveloped; it states also that the strategic land supply will continue to be regarded as a repository of affordable development land.
11. In accordance with the Core Strategy, NPPF and SAMDev plan paragraph 4.34, the strategic employment allocation identified at Shrewsbury South SUE is required to meet a range of employment generating uses, which reflect market demand. LIH consider that, for clarification, the wording of Schedule 16.1b should be amended to reflect the potential for a range of employment generating uses at Shrewsbury South SUE.

Change sought to the plan

12. The development guidelines for the Shrewsbury South Sustainable Urban Extension in Schedule 16.1b should be amended to read as follows:

*“Development to deliver comprehensively planned, integrated and phased development of the SUE having regard to the SUE Land Use Plan (Figure S16.1.1) and adopted masterplan. Development to include provision of a new strategic employment site south and east of the Football Stadium (22 ha.) and Phase 3 of Shrewsbury Business Park off Thieves Lane (4 ha.). The strategic employment site has the potential to accommodate a range of **employment generating uses including, types of business uses (B1, B2 and B8), including recycling and environmental industries, community services and facilities and tourism, retail and leisure uses (subject to town centre sequential and impact assessments where necessary).**”*