



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:	Stephen Ward
Organisation (if applicable):	Stephen Ward Town Planning and Development Consultants
Address:	Jocelyn House, Jocelyn Street, Dundalk, Co. Louth, Ireland
Email:	sward@wardconsult.com
Telephone:	+353 (42) 9329791

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

Name:	Mr. R. Johnston
Organisation (if applicable):	ABP
Address:	Battlefield Road, Harlescott, Shrewsbury, SY1 4AH
Email:	Ray.Johnston@abpbeef.com
Telephone:	+44 (0) 1743 422 322

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:

Shropshire County Development Map, Shrewsbury Area

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

Support	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	(Conditional Support)
Object	Yes	<input 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input checked="" type="checkbox"/>	No	<input 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	
Justified	
Effective	
Consistent with National Policy	

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).

ABP seeks to ensure the zoning of lands ELR006 (where the ABP plant is located) as Protected Employment Areas. ABP are a long established food production plant and provide employment for in excess of 500 persons. This proposed zoning of the land will assist ABP as an established employer in the area and reduce the risk of potential conflict with neighbouring uses.

Please see attached submission for detailed supportive reasons.

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)

N/A

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:

Please see submission attached. ABP is extremely concerned regarding encroachment of non-compatible uses on its facility at Battlefield Road.

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	✓
When the Inspector's Report is published	✓
When the SAMDev Plan is adopted	✓

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.

Planning Policy Team
 Shropshire Council
 Shirehall
 Abbey Foregate
 Shrewsbury
 Shropshire
 SY2 6ND

17TH April 2014

Dear Sir/ Madam

**RE: REPRESENTATION BY ANGLO BEEF PROCESSORS
 (ABP) SHREWSBURY ON THE PRE-SUBMISSION DRAFT
 (FINAL PLAN) VERSION OF SAMDEV PLAN 2014**

1.0 INTRODUCTION

This is a representation by Anglo Beef Processors (ABP) of Battlefield Road, Harlescott, Shrewsbury SY1 4AH in respect of *Site Allocations and Management of Development (SAMDev) Plan, Pre-Submission Draft (Final Plan)*, and specifically the land allocations within Shropshire Council Policy Map- Shrewsbury Area s.16- Inset 1 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. Whilst supporting the Employment Land Allocation north of the ABP Plant (ELR006), ABP submits the northern part of this new employment zone should be flexible between employment and residential.

Stephen Ward

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This representation seeks amendments to the following aspect of the Plan -

1. Expand the 'Protected Employment Zone' to the south-east (as illustrated on attached Map No. 1 attached).
2. Provide specific policy provision to allow connection across the stream between the employment protection area and the new employment allocation north of the ABP Plant.
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.

A completed Representations Form is attached.

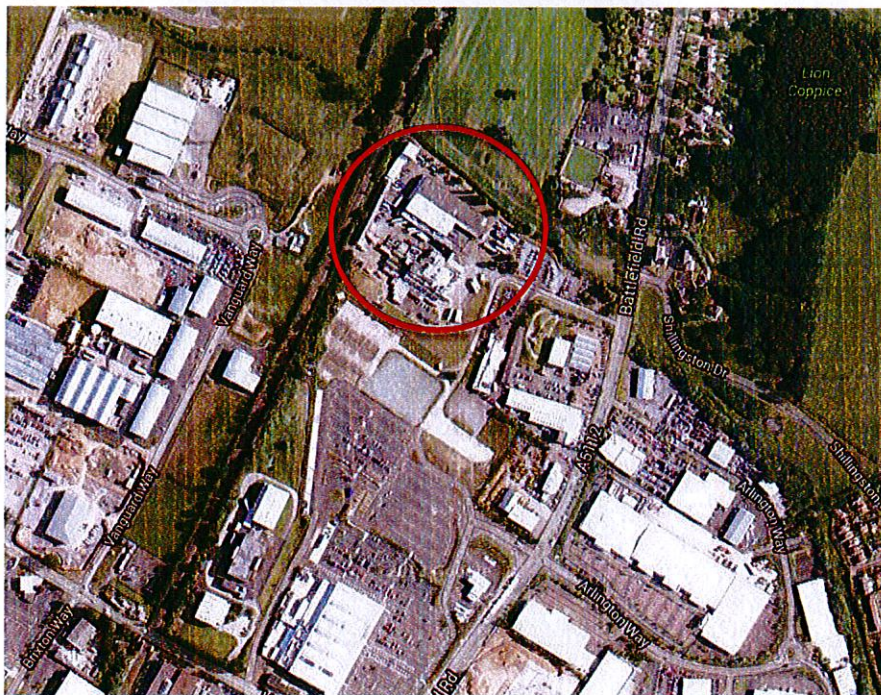
Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, County Louth, Ireland, act on behalf of ABP. Please address all further correspondence in relation to this matter to Stephen Ward Town Planning and Development Consultants at the above address or alternatively via email to sward@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. This facility is crucial in an area where 10,532 people have moved onto the job seekers allowance claimant count within the last year, despite the total unemployment rate decreasing in Shropshire. (Shropshire Council, 2014).

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 2013. There are only 20 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.

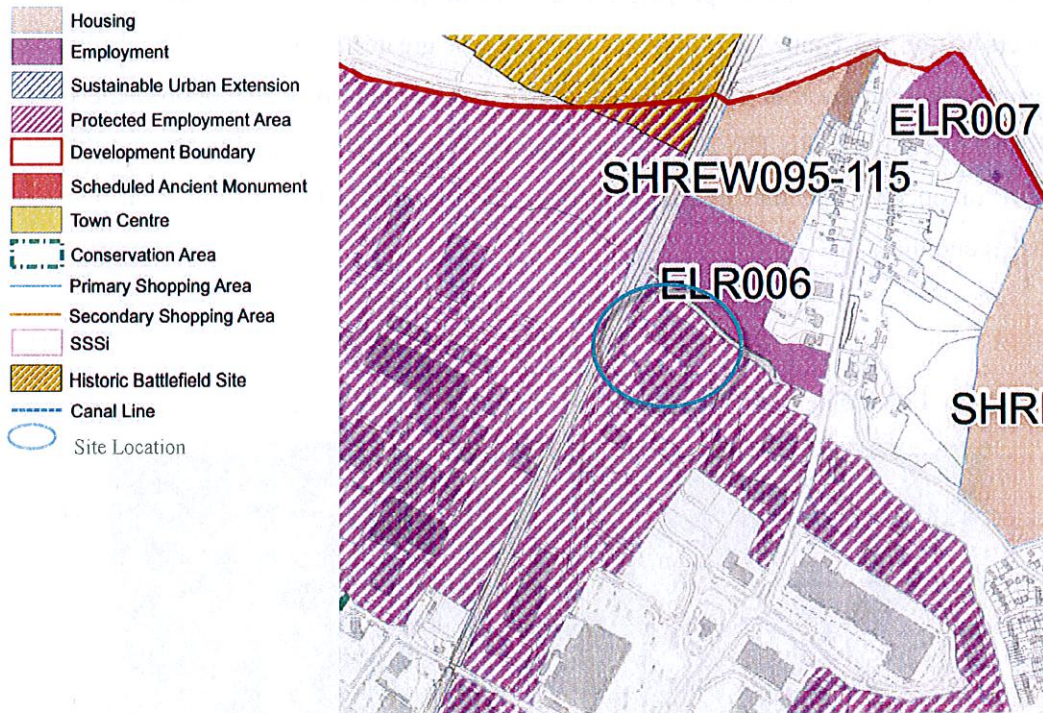
Figure 1 – Site Location



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.

3.0 PROPOSED LAND USE ALLOCATIONS MAP

Figure 2- Extract from Draft SAMDev Plan- Policy Maps S16 – Inset 1



This Draft SAMDev Map allocates the ABP Plant and surrounding the area as a 'Protected Employment Area', the land north of the site, ELR006, as an Employment area. ABP would be in support of these land-use allocations for the reasons outlined below.

4.0 LAND ALLOCATED 'PROTECTED EMPLOYMENT AREA' AT BATTLEFIELD ROAD

ABP made submissions during the various 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.

5.0 EXTENDING THE 'PROTECTED EMPLOYMENT AREA' TO THE SOUTH-EAST (SITE AREA OF 13/00392/FUL)

As an example of the degree of concern the Company lodged objections in respect of planning application 13/00392/FUL for a public house / restaurant, lodge hotel and hot food takeaway to the south-east of the Plant. Whilst following the ABP submissions the layout of the proposed development was altered so that the proposed hotel was moved further away from the ABP Plant, ABP is concerned, notwithstanding the now extant permission on this site (13/00392/FUL) that this area should be part of the Protected Employment Area. In this way the Planning Authority would retain better development management control in the event that other non-employment uses were proposed on the site of 13/00392/FUL.

We also highlight that the recent planning decisions to the south-east of the Plant were taken in somewhat of a plan-led policy vacuum.

6.0 NEW EMPLOYMENT LAND ALLOCATION NORTH OF ABP PLANT

ABP has 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). In the interests of flexibility ABP seeks a flexible policy base for the northern part of this new employment allocation between employment and residential.

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.

7.0 NEW HOUSING LAND ALLOCATION

ABP does not object to the new housing allocation SHREW095-115 but again requests that flexibility is built into the Plan between the this area and the employment area to the south. ABP also 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.

8.0 POLICY BASIS SUPPORT FOR LAND ZONING

National Planning Policy- The National Planning Policy Framework (NPPF) has as a key aim building a strong, competitive economy. Within this, Policy 22 states:

“In drawing up Local Plans, local planning authorities should:

.... Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances....”

Local Planning Policy- The Local Development Framework for the Adopted Core Strategy 2006-2026 also supports the objective of encouraging economic growth in the region. Policy CS13 confirms the importance of food and drink production and processing. The proposed ‘Employment Protection Area’ and the new 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 allocation of the ABP Plant and surrounding lands as a ‘Protected Employment Area’ will be complementary to the regional and local planning objectives.

9.0 CONCLUSIONS

ABP welcomes the publication of the Site Allocations and Management of Development (SAMDev) Plan and supports the proposed allocation of lands as 'Employment Protection Area' and new employment development area. The SAMDev Plan will provide for plan-led development by way of an up-to-date land allocation and development management base.

ABP submits as follows –

1. Development within the new housing allocation area SHREWS095-115 should not impact on the ABP facility including the operational requirements and access / egress to the public road network.
2. The northern part of the new employment allocation north of ABP should be flexible between employment and housing.
3. The 'employment protection area' allocation is supported.
4. The 'employment protection area' should be extended to the south-east.
5. Provide specific policy provision to allow connection across the stream between the employment protection area and the new employment allocation north of the ABP Plant.

Yours faithfully,

Stephen Ward