

# Shropshire Local Plan Examination

## Stage 2 Matters, Issues and Questions

Matter 6 Statement: Strategic Settlements (Policy S19)



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**Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options**  
Matter 6 Statement: Strategic settlements (Policy S19)

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Acronyms / Abbreviations

## **Acronyms / Abbreviations**

MOD	Ministry of Defence
NPPF	National Planning Policy Framework



Introduction

# 1 Introduction

## 1.1 Context

This Matter 3 Statement has been prepared by Stantec on behalf of Yareal Llandforda Limited (our Client) who are promoting Land to the north of Market Drayton at Longslow Farm (the 'site'), and Land to the north of Trefonen, for residential development.

Representations have previously been submitted on behalf of our Client to the 'Strategic Sites Consultation' (2019), 'Preferred Sites Consultation (2019), the Regulation 18 Pre-Submission Draft Shropshire Local Plan (2020), and Regulation 19 Pre-Submission Draft Local Plan (2021) in relation to the Local Plan Review process. These representations have been prepared by Stantec (formerly Barton Willmore – representor ID **A0387**) and David Parker Planning Associates (representor ID **A0430**). Stantec is now representing Yareal Llanforda in respect of both responses.

It is submitted that our Client's sites are suitable for meeting the housing needs of Market Drayton/ Trefonen and the wider County in the Plan period and should be identified as residential allocations in the Shropshire Local Plan.

Outlined in Section 2 of this Statement are responses to a select number of the Inspectors' questions which set out why we consider changes to the Local Plan are necessary to ensure the soundness of the Plan.

Reference to supporting documents are contained within bold square brackets e.g **[SD001]**.

This Statement has been prepared in line with the Guidance Note **[ID41]** for the Examination.

## 1.2 Yareal Llanforda

Yareal Llanforda Ltd is a subsidiary of Yareal UK Ltd; a farming and property business with two hubs: Lincolnshire in the East and Shropshire in the West. The business was established in 2015 as a vehicle to invest in the sector and develop a modern and sustainable agricultural, property and food business based on owned and rented land with diversity in location and activity. The Shropshire farms have livestock as their focus in the main. However, at the farm in Longslow, the activities are now mainly arable as the previous dairy was old-fashioned and uneconomical to run. The long-term dairy use at the farm is under consideration and various options are being explored to understand what is feasible, including the possibility of building a new dairy elsewhere within the estate. The development of Land at Longslow Farm would undoubtedly help to facilitate a new dairy as well as bringing a range of associated benefits to the local economy.

In the meantime, the crops grown on the estate provide feed for the cattle and other animals at their other farms in Shropshire.



## **2 Policy S19 – Clive Barracks, Tern Hill**

### **Question 1 – Is the amended policy justified effective and consistent with national planning policy?**

Policy S19 identifies Clive Barracks as a Strategic Settlement, with the accompanying explanation clarifying that the Site is currently home to the 1<sup>st</sup> (Regular) Battalion of the Royal Irish Regiment, however, the Ministry of Defence (‘MOD’) announced plans in 2016 (8 years ago) to relocate the regiment and dispose of the Barracks for redevelopment.

The proposed amendments to the Policy itself through the Schedule of Proposed Main Modifications (July 2024) [GC4M] are minor and predominantly relate to the additional requirement to provide a phasing plan as part of the proposed redevelopment, alongside clarified requirements in relation to public open space and playing pitch provision.

It is not considered that the Policy is justified, effective, or consistent with national policy for the following reasons.

The Policy sets out that the Site will provide around 750 dwellings. However, it does not make clear that the Site is only anticipated to deliver 350 dwellings by 2037/38, with the remainder of the dwellings to be completed beyond the Plan Period (as per the *Five Year Supply Statement*, 2023, [GC47]).

In this regard, Paragraph 22 of the National Planning Policy Framework (‘NPPF’) states that ‘*policies should look ahead over a minimum 15 year period, and for larger scale developments such as new settlements or significant extensions to existing villages/towns that form part of the strategy for the area, policies should be set with a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery*’. Despite this, the Policy (nor the Plan period) make provision for this longer-term vision or take into account the likely timescale for delivery.

Whilst the proposed *Schedule of Proposed Main Modifications* (July 2024) [GC4M] are minor in respect of the Policy itself, a raft of additional text is proposed to be added to the supporting text to elaborate upon the requirements of the Policy. The extent of this additional text is evidence that the Policy itself is not clear or effective. The justification for this additional text in the Main Modifications Schedule is “*Responds to Inspectors Interim Findings*” – we cannot see how.

In addition to raising concerns in respect of the deliverability of affordable housing at the site, the fact that the trajectory shows that 400 (now 350) of the 750 proposed dwellings will be delivered after the Plan period and a lack of evidence to demonstrate that the proposed allocation will be capable of supporting the necessary infrastructure and services planned, the Inspectors also raised concerns in respect about “*the vagueness of some of the Policy wording*” (Paragraph 51 of the Inspector’s Interim Findings [ID28]). The Council has done little to address these concerns and has instead added a raft of supporting text to the Policy, rather than addressing the wording of the Policy itself.

### **Question 2 – Is the housing trajectory for the site realistic and deliverable?**

The housing trajectory for the site appears to be fluid and beyond the control of the Council. The February 2022 iteration of the Housing Topic Paper [GC4I] sets out that the site’s current occupiers will



Policy S19 – Clive Barracks, Tern Hill

be relocated and the site released for development in 2025. However, the Topic Paper sets out that as a result of the Future Soldiers Project, the timescales for the release of the Barracks has moved from 2025 to 2029 (Footnote to Figure 3, Page 23). The Ministry of Defence announced plans to dispose of the Barracks for redevelopment in 2016.

As such, the submission version of the *Five Year Supply Statement (2020)* [EV48.03] set out that 550 homes were deliverable within the Plan Period, which has subsequently been updated to 350 homes in the latest *Five Year Supply Statement (2023)* [GC47] due to the Ministry of Defence's updated plans. This shows that the housing trajectory for this Site is being pushed further into the Plan Period, therefore it is questionable as to how many homes will be delivered within this Period.

It is evident that the timing for the disposal of the site is unreliable and beyond the Council's control. This casts significant doubt as to the extent to which development can be achieved within the Plan period (currently 350 dwellings, although no evidence is provided to suggest how this has been arrived at).

As set out in our Matter 25 Statement in relation to Five Year Housing Land Supply, clear evidence is required in order for a site to be considered deliverable, and this constitutes more than just being informed by landowners, agents or developers that sites will come forward. Rather, a realistic assessment of the factors concerning the delivery should be considered, including planning, technical, legal and commercial/financial aspects of delivery. Securing an email or completed pro-forma from a developer or agent does not in itself constitute clear evidence.

**Question 3 – Have the infrastructure requirements of the proposed strategic settlement been adequately identified and costed? Including the requirements for:**

- a) road improvements**
- b) air quality mitigation measures**
- c) sustainable transport networks**
- d) the primary school**
- e) healthcare**
- f) green infrastructure**
- g) leisure and sports facilities**
- h) local centre facilities**
- i) contamination remediation.**

Policy S19 requires a comprehensive masterplan to be prepared for the site which will comply with a number of identified guidelines, broadly related to the list of infrastructure requirements above. However, whilst these infrastructure requirements have been loosely identified within the Policy, the Local Plan Delivery & Viability Study (July 2020) [EV115.01] has not attributed a specific cost to any of the required items, stating "*The seven potential Strategic Sites have been identified and tested. In*





Policy S19 – Clive Barracks, Tern Hill

*considering these it is important to note that the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites. The current best estimate is as follows – Clive Barracks - £9,000,000". (Paragraph 10.83 [EV115.01]). (Emphasis Added).*

We cannot see that an assessment at any greater level of detail has ever been produced.

In addition, the Council's *Strategic Infrastructure and Investment Plan 2024* [GC54] identifies some of the above, specifically:

- Necessary Highway improvements to the local and strategic road network to facilitate redevelopment of the Barracks, which will be led by Developers/Shropshire Council and funded via the developer/developer contributions.
- Improvements to Tern Hill Roundabout (Junction of A41 and A53), will be led by Developers/Shropshire Council and funded by developer contributions.
- Appropriate pedestrian and cycle links to and through the Site including enhancement of an underpass of the A41, which will also be led by developers/Shropshire Council and either developer funded, or sought via developer contributions.
- The identification of 1ha of land for a new school.

However, the Investment Plan again does not identify any specific financial costings against these items.

It is therefore evident that significant doubt remains over the financial viability of the Clive Barracks allocation.

This in turn casts doubt in respect of the overall sustainability of the settlement, particularly given its scale but also the significant risk that any of the above infrastructure is not delivered, either at all due to viability or simply because it is not delivered in a timely manner due to ongoing viability discussions.

#### **Question 4 – Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?**

No. As described above the *Strategic Infrastructure and Investment Plan 2024* [GC54] sets out a number of projects associated with Clive Barracks strategic settlement:

- Community facilities within the local centre
- 1ha of land and a new primary school
- Necessary improvements to the local and strategic road network to facilitate redevelopment of Clive Barracks.
- Improvements to Tern Hill roundabout
- Appropriate pedestrian and cycle links to and through the site, including enhancement of an underpass of the A41.



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Furthermore, the *Draft Market Drayton Local Economic Growth Strategy (2020-2025)* **[EV45.03]** sets out that Tern Hill roundabout needs improvements to cope with additional workforce and the development of Tern Hill Barracks, identifying the delivery be via 'broker discussions with Highways England and consider as part of development of Clive Barracks' with the timescale being identified as 'short/medium'.

It is therefore our view that Land at Longslow Farm should be allocated within the Local Plan as it is capable of delivering within the Plan period. This is not to say that Clive Barracks should be excluded, but rather it should remain as a long-term strategic settlement providing additional housing delivery beyond the plan period, in line with the realistic timescales for its delivery.





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