

Shropshire Local Plan Examination

Stage 2 Matters, Issues and Questions

Matter 2 Statement: Development Strategy (Policies SP1-10 & SP12-15)



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Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options
Matter 2 Statement: Development Strategy (Policies SP1-10 & SP12-15)

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Acronyms / Abbreviations

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BNG	Biodiversity Net Gain
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal



Introduction

1 Introduction

1.1 Context

This Matter 2 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 Development Strategy

Question 1 – Do any of the policies in the Plan require updating as a result of changes in national planning policy since the previous hearings in July 2022?

Whilst the Local Plan is being examined under the 2021 iteration of the National Planning Policy Framework ('NPPF'), a key change that has occurred since the previous hearings in July 2022 is the introduction of mandatory biodiversity net gain ('BNG') through Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). BNG became mandatory in England from 12th February 2024.

Whilst this appears to be captured within Policy DP12 (The Natural Environment), it is not clear if or how the implications of BNG have been considered in respect of the capacity or deliverability of the proposed allocations, particularly the retained SAMDev allocations which were identified and allocated for development long before 10% BNG was mandatory. Should it transpire that the BNG has not been appropriately considered, it is likely that the capacity of the allocated sites would be reduced in order to accommodate on-site gains, necessitating the identification of further site allocations in order to meet the identified housing requirement.

Question 2 – Is it proposed that the overall spatial strategy and broad distribution of growth set out in Policy SP2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are any consequential changes to Policy SP2 or the supplementary text required?

The proposed spatial strategy and distribution of growth are broadly consistent with that previously proposed, as described at Section 21 (Spatial Strategy) of the *Housing and Employment Topic Paper [GC45]*. The differences are identified at Paragraph 21.7 of the Topic Paper, which includes:

- The proposed uplift of 500 dwellings to the proposed housing requirement and the associated proposed uplift to the housing guidelines and windfall allowances in Shrewsbury, Whitchurch and the Former Ironbridge Power Station, and
- Reference is included to the proposed housing (1,500 dwellings) and employment land (30ha) contributions to the unmet housing and employment land needs forecast to arise within the Black Country, including the associated identification of specific sites to accommodate this need.

At a more strategic level, Paragraph 21.6 of the Topic Paper summarises the proposed spatial strategy, including point b. which states:

“To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the ‘urban areas’, which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements.”



Development Strategy

We have previously commented upon this approach, both through our Regulation 19 stage representations, and orally at the Stage 1 Local Plan Hearing Sessions. However, in summary:

- We support the urban focused strategy set out in Draft Policy SP2 and the identification of Market Drayton as a Principal Centre.
- We support development in the Community Hubs, and it is necessary to support their long-term sustainability, however, the scale of development must be proportionate to the size and sustainability of the settlement. The approach needs to be more robustly justified, with reference to the scale of each settlement and its level of services and facilities as well as accessibility to higher order settlements. The spatial strategy should not be reliant on the overdevelopment of Community Hubs, but should instead focus on proportionate and sustainable growth alongside directing more growth to the higher order settlements such as Market Drayton.
- The Sustainability Appraisal ('SA') identifies predominantly positive outcomes associated with delivering an 'urban-focused approach' in relation to reducing carbon emissions, access to services, encouraging sustainable means of transport, and supporting active and healthy communities. Despite this, it does not appear that the scenario of a higher level of growth within the urban areas (more than the proposed $\approx 75\%$) has been tested.
- Further flexibility should be provided for in the housing land supply, in accordance with the approach taken in recent Local Plan examinations. This additional supply should be directed towards the urban areas/locations in accordance with the urban-focused strategy.

In respect of the proposed changes to the Local Plan, given they predominately related to a minor increase in the housing requirement, they are dealt with within our Matter 3 Statement (Housing Land Need, Requirement and Supply). However, in that Statement, we describe how the additional 500 dwelling uplift in particular is not justified. It appears the revised housing requirement has simply rounded the 'flexibility' provision within the housing requirement from 13.15% to 15% of the Local Housing Need ('LHN'), resulting in the provision of an additional 500 dwellings across the Plan period. It remains unclear exactly how this figure has been justified, including why the Council feels it is even required.

Question 3 – Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?

Through its updated SA site assessment process [GC44], three existing proposed site allocations have been identified to accommodate the proposed contribution of 1,500 dwellings towards the unmet housing need forecast to arise within the Black Country. These sites are:

- BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
- SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
- IRN001 - Former Ironbridge Power Station: 600 dwellings.



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Development Strategy

The updated additional SA assessment summarises the reasons these sites are proposed to accommodate the proposed contribution to the unmet housing need from the Black Country. In brief, these are justified by the Council based upon functional geography, including commuting patterns, road and rail links and the ability of these sites to accommodate a significant volume of development.

It goes on to conclude that the decision regarding appropriate sites to accommodate the proposed contributions to the unmet housing and employment land needs forecast to arise within the Black Country and the quantity of proposed contribution that should be accommodated upon them, were ultimately ones of professional judgement. As such, we do not comment on the appropriateness of the three identified sites themselves.

However, as articulated in our Matter 3 Statement, it is considered that significant risk exists in seeking to meet the unmet housing need across only three sites. There appears to have been little consideration as to how the unmet need would be accommodated if one or more of these sites failed to deliver homes, or failed to do so in a timely manner. Our Matter 3 Statement identifies ways in which this risk could be mitigated.





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