

# Shropshire Local Plan Examination

## Stage 2 Matters, Issues and Questions

Matter 20 Statement: Oswestry Place Plan Area (Policy S14)



Prepared for:  
**Yareal Llanforda Ltd**

September 2024

Prepared by:  
Ben Cook

Project/File:  
3331

**Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options**  
Matter 20 Statement: Oswestry Place Plan Area (Policy S11)

<b>Revision</b>	<b>Description</b>	<b>Author</b>	<b>Date</b>	<b>Quality Check</b>	<b>Date</b>	<b>Independent Review</b>	<b>Date</b>
1	Draft	BDC	19/09/24	MXS	19/09/24	MXS	19/09/24
2	Final	BDC	20/09/24	MXS	20/09/24	MXS	20/09/24



**Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options**  
Matter 20 Statement: Oswestry Place Plan Area (Policy S11)

The conclusions in the Report titled *Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options* are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from the Client and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Stantec's contract with the Clients. While the Report may be provided by the Clients to applicable authorities having jurisdiction and to other third parties in connection with the project, Stantec disclaims any legal duty based upon warranty, reliance or any other theory to any third party, and will not be liable to such third party for any damages or losses of any kind that may result.

Prepared by \_\_\_\_\_  
Signature  
Ben Cook  
Printed Name

Reviewed by \_\_\_\_\_  
Signature  
Mark Sitch  
Printed Name

Approved by \_\_\_\_\_  
Signature  
Mark Sitch  
Printed Name



Table of Contents

## **Table of Contents**

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Context.....	1
1.2	Yareal Llanforda .....	1
<b>2</b>	<b>Oswestry Place Plan Area.....</b>	<b>2</b>



Introduction

# 1 Introduction

## 1.1 Context

This Matter 20 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, 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.



Oswestry Place Plan Area

## 2 Oswestry Place Plan Area

### Question 1 – Is the approach taken to development in the Place Plan Area, justified, effective and consistent with national policy?

As set out in the Regulation 19 Representation prepared by David Parker (respondent **A0430**) on behalf of our Client, Yareal Llanforda, we are supportive of Trefonen being identified as a Community Hub, but we consider that the approach taken to development within the Oswestry Place Plan Area is currently unsound as it is not justified, effective or consistent. We consider that the residential development guideline should be met through appropriate housing allocations to ensure the housing requirement is actually delivered.

Draft Policy S14 identifies the specific development requirements and locations for future development within the Oswestry Place Area. This is set out within four subsections to the Policy as follows:

- S14.1. Development Strategy: Oswestry Principal Centre
- S14.2. Community Hubs: Oswestry Place Plan Area
- S14.3. Community Clusters: Oswestry Place Plan Area
- S14.4. Wider Rural Area: Oswestry Place Plan Area

At Policy S14.2 it identifies a number of Community Hub settlements along with their residential development guidelines. Trefonen is identified as one of 11 Community Hubs for this area which had a residential guideline of 55 dwellings in the submission Local Plan **[SD002]**. However, through the *Updated Schedule of Main Modifications* July 2024 **[GC4M]** this has been reduced to 35 dwellings, although no explanation is provided as to why<sup>1</sup>. We accordingly object to this reduction as it is not justified.

Irrespective of this reduction, as per our Client's Regulation 19 representation **[A0430]**, Policy S14.2(i) fails to allocate any sites within Trefonen to meet the settlement guideline of either 35 or 55 dwellings.

In this regard, Paragraph 5.198 of the Local Plan (supporting text to Policy S14) states:

*“Development in the proposed Community Hubs responds to the scale and character of each area, as well as the availability of suitable development options. Where it has been appropriate to allocate land to deliver the local housing guideline the development guidelines reflect this in Schedule S14.2. **There are no allocations identified for Kinnerley or Trefonen, and instead the development of suitable infill development along with affordable exception and cross-subsidy sites in appropriate locations outside of the development boundary, will be supported where they help deliver housing which meets identified local needs.**” (our emphasis)*

---

<sup>1</sup> The “Reasons” provided in the Schedule simply states “*Reflecting wider changes. Consistency. Clarification.*”



**Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options**  
Matter 20 Statement: Oswestry Place Plan Area (Policy S11)

Oswestry Place Plan Area

It is clear that the above Paragraph does not justify the proposed approach and, as stated in our Client's Regulation 19 representation **[A0430]** and our Matter 27 Statement in respect of Policy SP8 (Managing Development in Community Hubs), this approach is inconsistent with the approach taken in the other Community Hubs, which are all otherwise subject to named allocations.

As stated in our Client's Regulation 19 representation **[A0430]**, the inference is that no sites are allocated at Trefonen as the prevailing housing need is for affordable rather than market housing. However, it is entirely unrealistic to expect 35 (or indeed 55) affordable dwellings to come forward as affordable housing exception or cross-subsidy sites at a single settlement. As set out in our Matter 27 Statement, despite cross-subsidy exception schemes being permissible under the current Core Strategy, no cross subsidy sites have come forward for development since the adoption of the Core Strategy in 2011.

Conversely, it is commonly accepted that affordable housing is most effectively provided as a percentage of a market-led scheme, due to the viability associated with developing affordable housing.

Whilst it is appreciated that the remit of the Local Plan Inspectors is not to consider the relative merits of omission sites, should the Inspectors be minded to concur that Trefonen should be subject to allocation/s in order to meet the identified growth guideline (and/or affordable housing need), further detail in respect of the merits and suitability of our Client's site North of Trefonen can be found in the Regulation 19 Representation prepared by David Parker Planning Associates **[A0430]**. It is nonetheless our view that the site represents a suitable site allocation and should be identified within the draft Schedule S14.2 (i) for Trefonen, in order to secure future housing delivery in the Community Hubs as opposed to a reliance upon affordable exception and cross-subsidy sites outside the development boundary.





---

Stantec is a global leader in sustainable architecture, engineering, and environmental consulting. The diverse perspectives of our partners and interested parties drive us to think beyond what's previously been done on critical issues like climate change, digital transformation, and future-proofing our cities and infrastructure. We innovate at the intersection of community, creativity, and client relationships to advance communities everywhere, so that together we can redefine what's possible.

