

Shropshire Local Plan Examination

Stage 2 Matters, Issues and Questions

Matter 17 Statement: Market Drayton Place Plan Area (Policy S11)



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Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options
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Introduction

1 Introduction

1.1 Context

This Matter 17 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 Market Drayton Place Plan Area

2.1 Market Drayton Place Plan Area

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

Whilst we are supportive of Market Drayton being identified as a Principal Centre and being the main focus for growth in this Place Plan Area, we consider Policy S11 is currently unsound as it is not justified or effective. We consider that additional housing growth should be directed to the Principal Centre of Market Drayton and that additional housing allocations are required to ensure delivery of the residential development requirement.

This draft Policy details the specific development requirements and locations for future development within the Market Drayton Place Area. At *Policy S11.1 Development Strategy* it identifies a number of key policy provisions for the Principal Centre of Market Drayton, including acting as a focus for strategic growth, delivering around 1,200 dwellings and making available around 35 hectares of employment land.

The allocations for Market Drayton are identified Under Schedule S11.1(i) although it is noted that these allocations are those that were included in the Market Drayton Neighbourhood Plan which was found not to meet the Basic Conditions at Examination (October 2018). In our previous representations to the draft Local Plan consultations (and the Market Drayton Neighbourhood Plan) we have expressed a number of concerns in relation to these proposed allocations. These are set out in full within our Regulation 19 Representation¹. However, in summary, these sites face a number of development constraints, including ecological, heritage, flood risk, noise and potential viability issues.

In advance of the Stage 2 Hearing Sessions, the Council has produced the *Update on the Status of Proposed ‘Saved’ SAMDev Plan Allocations and Proposed Draft Shropshire Local Plan Allocations [GC51]*. The purpose of this document is to demonstrate the deliverability of the proposed allocations within the Plan period, but it actually serves to highlight that none of the allocations currently have planning permission², this is despite the Council relying on three of these sites³ delivering homes within its five-year supply, as set out within Appendix F of the *Five Year Housing Land Supply Statement [GC47]*. It is submitted that this is likely due to the deliverability issues associated with these sites and reaffirms the concerns we raised in our Regulation 19 Representation.

As set out in our Matter 25 Statement with respect to the Five-Year Supply, allocated sites should only be considered deliverable where there is clear evidence that housing completions will begin on sites within five years. The onus is on the local planning authority to provide that clear evidence for outline planning permissions and allocated sites. Clear evidence must be something cogent, as opposed to

¹ Reference: 29135/A3/SJ/JB/bc dated 23rd February 2021

² Not only do MDR039 & MDR043 not have planning permission, but have actually been subject to refused planning applications 21/04307/OUT and 23/00089/OUT

³ MDR006, MDR039 & MDR043.



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simply mere assertions by landowners, agents or developers that sites will come forward. Instead, a realistic assessment of the planning, technical, legal and commercial/financial aspects of delivery should be assessed.

The Council has simply not done this in respect of the Market Drayton allocations, and instead relies on support from the promoters of the sites in respect of their deliverability (*Five Year Housing Land Supply Statement [GC47]*, Appendix F, page 7).

In order for Policy 11 of the Local Plan to be justified and effective, we consider the Local Plan should fully consider alternative reasonable site options along the A53 to ensure the housing strategy for Market Drayton is achievable, particularly in light of potential delivery issues associated with allocations MDR039 and MRD043. Our Client's site provides an alternative option for providing both the necessary housing and the relocated or additional sports facilities in a more sustainable location closer to the town centre and other potential new development (including site allocation MDR006).





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