



LOCAL PLAN REPRESENTATION

**Prepared and submitted on behalf of
Pentons Haulage & Cold Storage Retirement Benefit Scheme**

in response to the

Regulation 19 Pre-Submission Draft Shropshire Local Plan 2016 – 2038

February 2021

**J10 Planning Limited
2 Wrexham Road Chester CH4 7QR
01244 349400
www.j10planning.com**

Policy DP1 : Residential Mix

it is not always going to be feasible to deliver specialist housing for older persons on schemes of over 50 units. Extra care or retirement housing (esp. those with care elements) can generally only be delivered in volume and operators tend to deliver such accommodation as bespoke schemes in their own right. This policy objective might be possible on sites exceeding 200+ units but on smaller schemes such an obligation is likely to render many schemes undeliverable if compelled to deliver this type of accommodation due.

Providing lifetime homes or accessible/adaptable dwellings is quite a different objective.

The Council accept there is a need to deliver specialist (care) housing but fail to make provision in their draft allocations. A separate policy to deliver specialist housing is considered necessary as NPPF Para 61 guides and NPPG recommends in ID63.

This policy is not considered to be SOUND as it is not justified, effective or consistent with national policy.

Policy S14 Oswestry Place Plan Area

S14.2 Community Hubs

The guideline of around 125 dwellings for Ruyton XI Towns and around 155 dwellings for Weston Rhyn could be construed by some as being a maximum. The policy should make it clear that these figures are not meant to be seen as a “cap” but instead be expressed as a minimum.

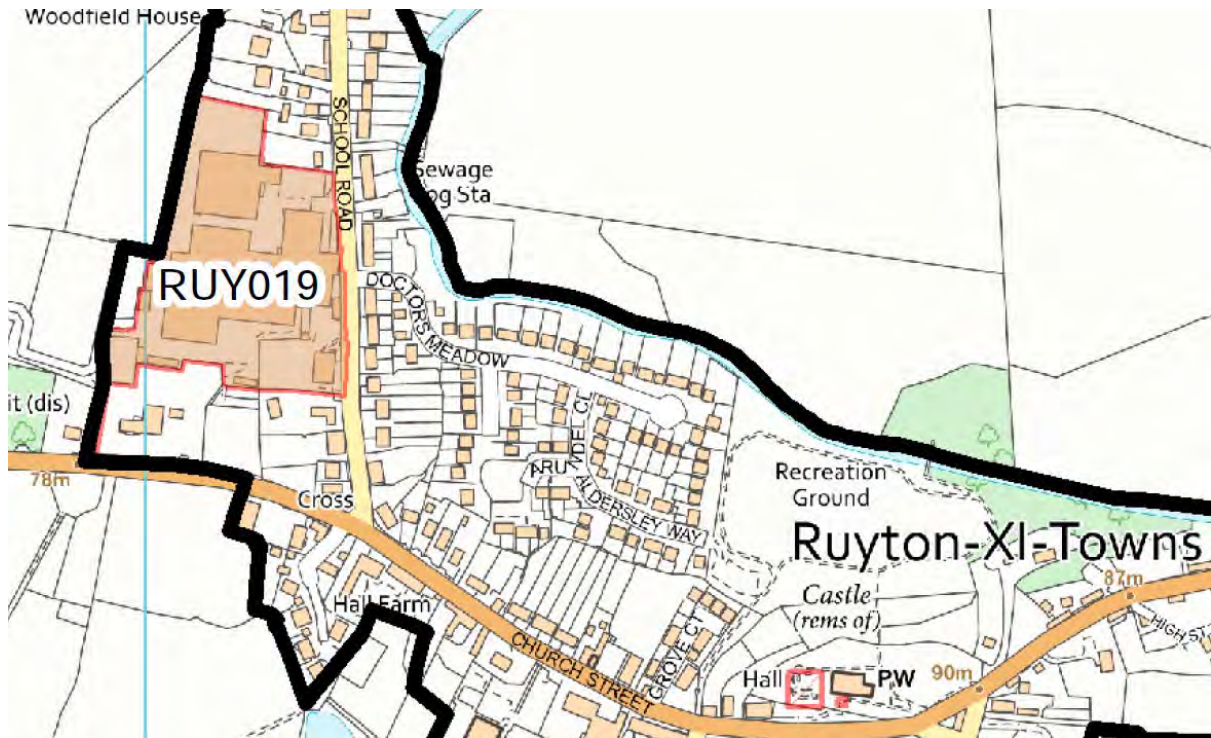
Schedule S14.2(i) Site Allocations

Former Dairy, Ruyton XI Towns (RUY019)

The policy wishes for any redevelopment of the site to consider the potential for interpretation of heritage features on the site and also the contribution it might make to the wider heritage features elsewhere in the settlement (e.g. Ruyton Castle Scheduled Monument), but there are no known features on the site (our Archaeological Desktop that supported the Outline PP ref. 10/04143/OUT) demonstrates this and to associate this site with the Castle remains SAM located way beyond the site demise to the east of the village (as depicted on the Place Plan extract below) is unreasonable.

We consider the site to be viable and deliverable having regard to the policy requirements of the Regulation 19 Local Plan : subject to the concerns we have raised, in particularly in relation to policy DP1 and our observations above in relation to density, as the site might offer greater scope for more than 65 dwellings.

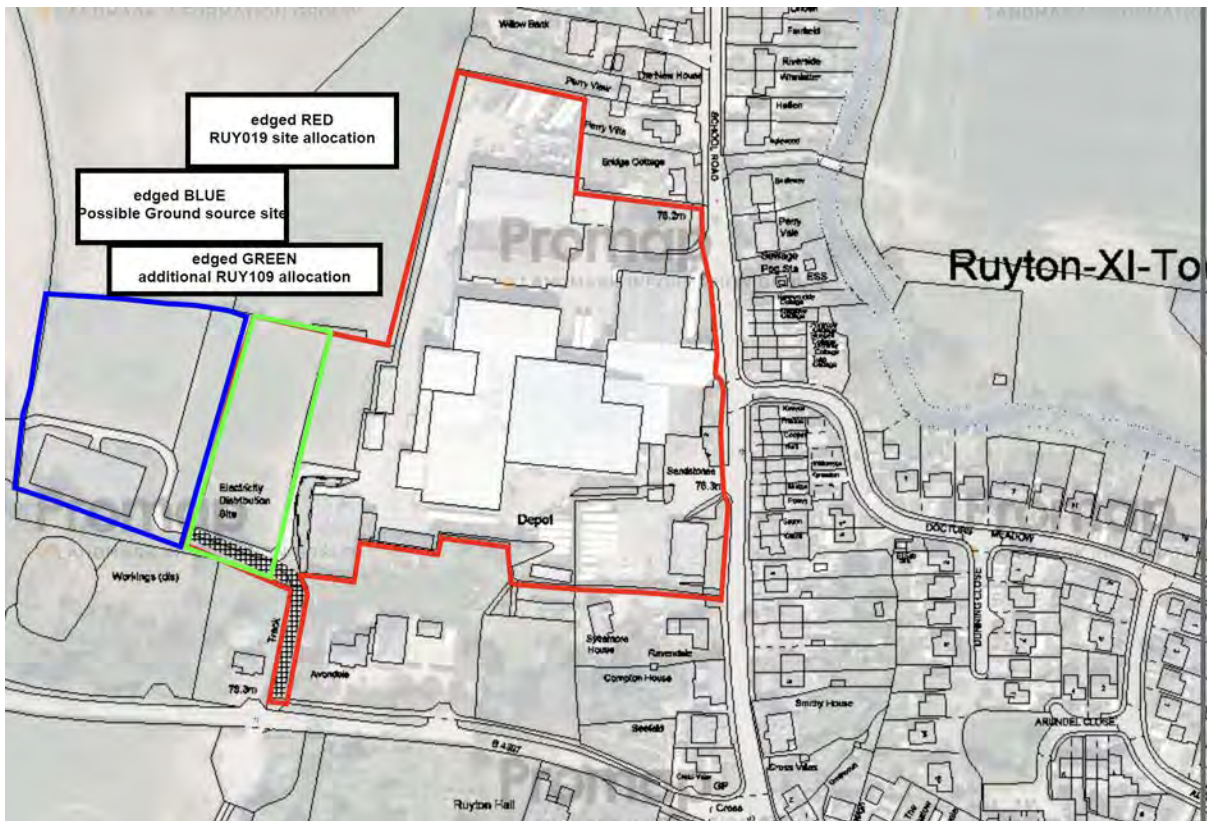
The draft Proposals Map extract is shown below.



We would like to mention that the Parish Council have approached us to explore whether there might be an opportunity for this site to offer a ground source heat concept for the development and/or wider community. This is an interesting concept and one that could be explored by considering the use of the paddock land to the west of the developed site. It is not something that my clients have investigated, but the feasibility is something that the Parish are keen to establish.

As you know the RUY019 allocation is a brownfield site and subject of normal CIL and affordable considerations with a large amount of (as yet) undefined remediation costs.

Therefore, the only incentive to consider this opportunity further is if the allocation (shown edged RED) was extended to include the small paddock to the west (shown edged GREEN) which might enable any renewable energy scheme to be brought forward on the field (shown edged BLUE) to the west of the paddock.



For information, a purchaser of the site was lined up in 2017 but they fell away once it became clear they had insufficient financial security. Subsequently, my clients then agreed terms with another developer and were on the cusp of entering into an exclusivity agreement (subject to site investigations) at the start of 2020 just before Covid hit. But, as the pandemic commenced, the prospective purchaser was unable to instruct the SI and a natural “lull” in proceedings followed, whereupon they pulled out in August 2020 citing a change in their business model.

The site remains on the market and enquiries are still being fielded, with a couple of interested parties having recently made approaches. However, a refreshed marketing campaign is expected to be launched soon given that my client is committed to disposing of the site with a view to enabling it being re-purposed.

The 5-Year Housing land supply position (published March 2020) identifies the site having a capacity for 80 dwellings and that this will be delivered from 2024 onwards.

We concur with the capacity but feel that there is an opportunity to bring this site forward sooner, with a start in maybe 2023.