



Representations to the Regulation 19 Pre-Submission Draft

Shropshire Local Plan Review

for The Strategic Land Group Ltd

EP ref: 18-529

Project : 18-529
Document : Shropshire Local Plan
Review
Client : The Strategic Land
Group Ltd
Date : 26 January 2020
Author : John Coxon

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited
trading as Emery Planning.

Contents:

1. Introduction	1
2. National Planning Policy and Guidance	2
3. Strategic policies	4
4. Development management policies	8
5. Policy S11 – Market Drayton Place Plan Area	17
6. Site MDR006 - Land adjoining Adderley Road, Market Drayton	20
7. Sustainability Appraisal	30
8. Summary and conclusions	31
9. Appendices	32

1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as 'SLG') to submit representations to the Regulation 19 consultation on the Local Plan Review: Pre-Submission Draft (hereafter referred to as the 'draft plan').
- 1.2 SLG is promoting the land adjoining Adderley Road, Market Drayton, which is a draft allocation for a residential development of approximately 125 dwellings (site ref: MDR006). A site location plan is attached at Appendix EP1. SLG supports the allocation of the site.
- 1.3 These representations and supporting documents demonstrate that the allocation of the site is sound, in that it is justified by the evidence base and the site is deliverable in the next 5 years with no technical constraints. The site would form a logical and sustainable urban extension to Market Drayton, and the allocation is clearly supported by the Council's evidence base.
- 1.4 These representations also set out SLG's position in relation to other strategic and development management policies in the plan. Whilst SLG is supportive of the allocation and the plan as a whole, these representations do identify some issues of soundness, particularly in relation to detailed development management policies. In all cases these issues can be rectified through modifications to the plan.

2. National Planning Policy and Guidance

National Planning Policy Framework (the Framework)

2.1 The revised Framework was published in February 2019. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The Framework, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system.

2.2 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

2.3 Paragraph 35 provides the following in relation to soundness:

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs [19]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

19. Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.

National Planning Practice Guidance (NPPG)

- 2.4 The NPPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the NPPG was published. Local Plan making is addressed under Section 12.

3. Strategic policies

Policy SP2 – Strategic approach

Housing requirement

- 3.1 Policy SP2 sets a requirement to deliver 'around' 30,800 new dwellings and around 300 hectares of employment land over the plan period from 2016 to 2038. This equates to 'around' 1,400 dwellings and 15ha of employment land per annum.

Expressing the requirement as a minimum

- 3.2 We object to the use of the word 'around'. Paragraph 59 of the Framework sets a requirement to 'boost significantly' the supply of housing land. As such, the housing requirement should be expressed as a minimum. The issue was addressed in the Lichfield District Local Plan Strategy Inspector's Report (2015), where the Inspector stated at paragraph 58:

"Given the need to boost significantly the supply of housing land and given that the argument has not been made that factors such as Green Belt restrict the ability of the District to meet its objectively assessed need, this figure should be expressed as a minimum as is proposed in MM2."

- 3.3 The Middlesbrough Council Housing Local Plan Inspector's Report (October 2014) also provided the following at paragraph 21:

"It should be made clear in the LP that the requirements are generally to be seen as minimum requirements to ensure the LP is effective and does not stifle development unnecessarily through the imposition of ceilings."

- 3.4 Paragraph 3.6 of the draft plan makes clear that a housing requirement of 30,800 dwellings is necessary to meet housing need and support the long-term sustainability of the County, and to provide flexibility to respond to rapid change as required under the Framework. Paragraph 3.7 clarifies that the requirement also incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan. In this context, and the ongoing policy imperative to boost significantly the supply of housing land, we consider that the housing requirement must be expressed as a minimum figure.

Whether the housing requirement is sufficient to meeting identified needs

3.5 Paragraph 60 of the Framework provides:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

3.6 Local Housing Need is defined in Annex 2 of the Framework:

“The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).”

3.7 The application of the current standard method results in a minimum local housing need of 1,177 dwellings per annum for Shropshire. However, the standard method does not take into account the Council's economic strategy or ambitions, affordable housing need, or any allowance for meeting any unmet needs from the Black Country. Due to these factors, we agree that there is clear justification in Shropshire to plan for a higher housing requirement figure than standard method indicates, in accordance with paragraph 2a-010 of the NPPG.

3.8 The Council's position is that a requirement of 30,800 dwellings (1,400 per annum over the plan period) is sufficient to address the Council's economic strategy and affordable housing needs. It also factors in an allowance for meeting the unmet needs from the Black Country. However, it should be noted that the 2018-based household projections for Shropshire indicate an increase of 1,644 households per annum. Furthermore, the Government's consultation on proposed changes to the standard method for calculating local housing need¹ resulted in a figure for Shropshire of 2,129 dwellings per annum. This exceeds the housing requirement proposed in the emerging Local Plan Review by approximately 50%.

3.9 At this stage, the 2014-based projections remain the starting point for assessing housing need. However, it must be noted that the emerging housing requirement of 30,800 dwellings appears to be very conservative in comparison to what the need for housing in Shropshire is likely to be

¹ Government consultation: *Changes to the current planning system (August 2020)*

during the plan period, having regard to the Government's proposed changes to the standard method.

- 3.10 The Local Plan Review may ultimately need to be reviewed soon after adoption to take into account the new methodology and any other changes to national planning policy, as proposed through the recent White Paper². However, given that the Council is at an advanced stage of plan preparation, to await the revised Framework / standard method before proceeding would significantly delay the adoption of the plan and risk suppressing rather than accelerating housing delivery in the County. The only logical option is to proceed to submission and adopt this plan as quickly as possible, and to allocate sites (particularly those which can deliver in the short term) to meet housing needs now. The plan represents a clear opportunity to boost the supply of housing land in the short term, and any such allocations would contribute to meeting housing needs in the future should they be increased.

Housing land supply / trajectory

- 3.11 Paragraphs 3.10 and 3.11 of the draft plan indicate that housing delivery is likely to be around 1,400 dwellings per annum. However, the trajectories referred to within the supporting text and Appendix 7 of the plan do not appear within the plan itself. In accordance with paragraph 73 of the Framework, a trajectory should be prepared and included within the plan so that performance against the housing requirement can be monitored.
- 3.12 Appendices 5 and 7 of the plan provide information on the distribution of housing and the proposed timescales for delivery on the site allocations, but it is not possible to establish a detailed trajectory from this information. Notwithstanding, our overall concern is that the total housing supply identified in Appendix 5 only amounts to approximately 27,750 dwellings. The proposed strategic settlements are identified to deliver a further 1,750 dwellings, however this still leaves a shortfall of approximately 1,300 dwellings (i.e. just under 1 years' worth of supply). Even if this shortfall can be accounted for through other rural windfall completions / windfalls, there does not appear to be any flexibility within the supply to deal with rapid change.
- 3.13 Whilst we do not object to the allocation of the Clive Barracks at Tern Hill and the Former Ironbridge Power Station strategic sites, the Council needs to be realistic in its expectations for delivery. In our view the delivery forecasts for these sites suggested at Appendix 7 are very

² Government White Paper: *Planning for the Future* (August 2020)

ambitious having regard to the scale of proposed developments and the significant infrastructure requirements related to new settlements. It is therefore critically important that the plan still provides a sufficient supply of deliverable sites free of constraint, which are capable of coming forward in the early and middle parts of the plan period, to ensure the Council is able to demonstrate a five-year supply on adoption and throughout the Plan period, and to meet immediate needs within the key settlements (Shrewsbury and the Principal Centres).

Settlement hierarchy

- 3.14 Market Drayton is identified as a Principal Centre, alongside Bridgnorth, Ludlow, Oswestry and Whitchurch. This reflects the credentials of Market Drayton as a sustainable location for accommodating growth, and the settlement hierarchy set out at Schedule SP2.1 is clearly justified by the Hierarchy of Settlements report (August 2020). We therefore support the designation of Market Drayton as a Principal Centre. However, we consider that Market Drayton could accommodate a greater proportion of development than is currently proposed in the draft plan. We address this in our response to Policy S11 (Market Drayton Place Plan Area).

4. Development management policies

Policy DP1 – Residential mix

Housing mix

4.1 Policy DP1(1) states:

“Residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, including families with children, older people, people wishing to build their own homes and people with disabilities and special needs, in accordance with Shropshire Council's Strategic Housing Market Assessment (SHMA).”

4.2 Policy DP1(2) continues:

“On sites of 5 or more dwellings:

a. In locations where a Local Housing Need Survey has been undertaken through the ‘Right Home Right Place’ initiative or an equivalent survey endorsed by Shropshire Council, at least 50% of open market dwellings will reflect the profile of housing need established within the survey; or

b. At least 25% of open market dwellings will be dwellings with 2 bedrooms or less. At least a further 25% of open market housing will be dwellings with 3 bedrooms or less. The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes.”

4.3 The policy therefore has multiple aspects which relate to mix. We deal with each aspect in turn.

4.4 In relation to the SHMA (as referenced in Policy DP1(1)), this sets out an analysis of housing need to 2036, broken down by sizes, types and tenures (SHMA Part 2, Section 3). However, there are several significant issues when using this analysis to determine the mix of housing on sites:

- Firstly, the 2020 SHMA assesses household change using the 2014-based Sub National Household Projections (SNHP), which equates to household growth of 19,136 over the plan period (989 household per annum). This does not correlate with the proposed housing requirement figure in the plan (1,400 dwellings per annum). It cannot be assumed that the difference (just over 400 dwellings per annum) needs to be provided at a similar mix to the elements of household growth that have been assessed.

- Secondly, the SHMA does not assess the size, type, tenure and range of housing that is required in particular locations or settlements. Shropshire is a large authority area and there will be significant divergences between the demographic and demand drivers behind housing mix within different areas and settlements.
- Thirdly, the SHMA fails to adequately consider market trends and demand. Even if the SHMA methodology is considered to provide a robust projection in terms of the baseline demographics, it does not provide any evidence to suggest that the disaggregation of this data into different household groups accurately reflects the needs of the current or future population (factoring in demand and habits). For example, there is no reason why a single or two person household cannot buy or rent a three or four-bedroom home – indeed, they might even prefer to do so; hence demographic projections which suggest an increase in smaller households, for instance, do not necessary translate into a need for smaller units. Additional factors to consider include the demand for spare bedrooms for family guests (particularly relevant to an ageing population), and increasing demand for home working which often results in the need for an additional bedroom to be utilised as a home office. Whilst the COVID-19 pandemic has forced people to homework on a temporary basis, significantly higher levels of homeworking (potentially for multiple persons within a household) are likely to continue in the future.

4.5 As such, the demographic-based projections produced by the SHMA fail to consider the full picture and do not accurately reflect market demand. It is therefore essential that Policy DP1 recognises this and is amended to make clear that the dwelling mix set out in the SHMA is a starting point only, and is to be applied flexibly, reflecting local needs and market demand.

4.6 Turning to Policy DP2(2)(a), the Council's Right Home Right Place survey is an innovative and positive method for looking at need and demand within parts of the borough. However, we do not consider that it is a sufficiently robust method for determining the mix of 50% of the dwellings on a site, particularly larger sites, as the survey is likely to only capture a small part of the market at any one time. The survey also appears to have a focus upon certain segments of the market such as affordable housing, noting that it does not seek to disaggregate rents above £650 per month or market value of a property above £180,000. We would therefore question whether the survey would adequately reflect the need and demand for market housing, and whether sufficient numbers of households seeking housing within higher price bands are likely to engage with this type of survey to provide an accurate reflection of the market. Therefore whilst such a

survey could be a material consideration in determining the mix of housing, we do not consider that it is appropriate for the policy to stipulate that 50% of the housing should follow the mix deriving from such a survey.

4.7 Finally, in relation to Policy DP2(2)(b), this sets out a precise mix for 50% of the market dwellings (25% 2-bedroom and 25% 3-bedroom) in the event that a Right Home Right Place survey has not been undertaken. It is not clear what justification there is for setting these requirements. Table 11 of the SHMA estimates a need for 5,459 2-bedroom dwellings and 9,454 3-bedroom dwellings. Notwithstanding the significant limitations in the SHMA data (see paragraph 4.4 of this statement), even these figures do not justify the proposed mix of 25% 2-bedroom and 25% 3-bedroom dwellings. The policy appears to be seeking a disproportionately high level of 2-bedroom dwellings. It is not clear why the policy does not similarly set out any minimum requirement for larger 4+ bedroom homes, given the important role that such housing can play in meeting the needs of families and freeing up smaller accommodation elsewhere in the supply chain.

4.8 To conclude on this issue, we consider that in order for the plan to be sound, a far more flexible policy approach is needed which properly reflects the nature of the evidence base, which has inherent demographic limitations and cannot fully reflect market demand and people's aspirations. Such an approach would also reflect the fluid nature of the issue, having regard to changing practices such as increased levels of working from home, which may increase demand upon house sizes and bedroom spaces. We therefore consider that the policy should be amended to state that, where appropriate, residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, having regard to evidence from the SHMA, market demand and any other local evidence (including the Council's Right Home Right Place survey).

Wheelchair accessible dwellings

M4(2) standard dwellings

4.9 Policy DP1(5) requires, on sites of 5 or more dwellings, 70% of new housing be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations.

4.10 Paragraph 56-007 of the NPPG requires local planning authorities to use the following evidence justify setting higher accessibility, adaptability and wheelchair housing standards:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability.

4.11 The need for higher accessibility, adaptability and wheelchair housing standards is addressed at paragraphs 6.267 – 6.294 of the SHMA. However, the evidence does not appear to support the proposed requirement for 70% of all new dwellings to meet M4(2) standard.

4.12 Firstly, the analysis in the SHMA (paragraphs 6.290 – 6.294) cites the upper levels of need identified in Table 94. However, the preceding analysis at paragraphs 6.258 – 6.266 indicates that this need could be met through homes built to M4(1) standard, which is required by building regulations for all homes. It does not represent a total need for homes to be built to the higher M4(2) standard.

4.13 Secondly, and notwithstanding the above, Table 94 of the SHMA applies the very broad assumption that only 53% of Shropshire households in current or future housing need due to a long-term health or physical disability (LTHPD) could be absorbed by converting existing properties to bring them up to M4(1) standard. However, that assumption fails to recognise that for households who require adaptations where these are not possible in their current home, their choice is not simply to stay in their current home or acquire a new dwelling built to M4(1) or M4(2) standard. It is reasonable to assume that such households would also consider moving to one of the 10,000 houses already built to M4(1) standard, or one of the 73,000 properties within Shropshire which the SHMA estimates can be brought up to M4(1) standard (SHMA, Figure 70). Furthermore, paragraph 6.292 of the SHMA also recognises that that a proportion of this need will be met within specialist older person accommodation, but this does not appear to be quantified within the assessment.

4.14 Thirdly, even if the upper need figures set out in Table 94 are realised, and it is assumed that all of that need is for M4(2) or M4(3) accommodation and none of that need is met within the existing stock, it is not realistic to assume that such a large proportion of the 30,800 dwellings

planned in the Local Plan Review need to be built to that standard to meet the need. The housing market does not work in such a way that building thousands of homes to M4(2) standards will result in them being purchased and occupied by households falling within that need. There will be significant demand for new housing from other elements of the population, and furthermore many households will stay (by choice) in their existing homes even if it is not of an accessibility standard which meets their needs.

- 4.15 We therefore consider that the evidence and policy should be reviewed, and more realistic assumptions applied. We note that in other recent Local Plans where requirements for M4(2) housing have been introduced, the requirement has been far lower than proposed in Shropshire. For example, in Central Lincolnshire the requirement is 30%, and in Harrogate the requirement is 25%.

M4(3) standard dwellings

- 4.16 Policy DP1(4) requires all dwellings specifically designed for older people or those with disabilities or special needs will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations. Policy DP1(5) requires, on sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations.

- 4.17 Paragraph 56-009 of the NPPG provides:

“What issues should local planning authorities consider in determining whether dwellings should be fully wheelchair accessible or adaptable?”

Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.”

- 4.18 The proposed policy therefore appears to be inconsistent with the NPPG, which is clear that the requirement for wheelchair accessible homes (i.e. M4(3) standard) should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (i.e. certain types of affordable housing). The policy needs to make clear that the 5% requirement only applies to the element of affordable housing.

- 4.19 In terms of viability, the Council's Viability Study (paragraph 8.15) assumes that any wheelchair accessible homes will be affordable homes, in accordance with the section of the NPPG referred to above. However, the cost is still projected to be significant (£10,111 per dwelling, or £32,750 per hectare based on a 5% requirement). The Viability Study indicates that viability in many parts of the borough is challenging, with the affordable housing requirement of 10% being pursued on the basis of 'on-the-ground' experience rather than the results of the assessment itself. However, such on the ground experience was achieved prior to the introduction of additional policy requirements.
- 4.20 To conclude, we do not consider that the tests of necessity and viability as set out in the NPPG have been met in relation to the proposed requirements for M4(2) and M4(3) standard dwellings.

Specialist housing

- 4.21 Policy DP1(6) requires specialist housing, including older persons accommodation and specialist dwellings to meet the needs of those with disabilities and special needs, on all sites of 50 or more dwellings.
- 4.22 Whilst we recognise that there is a need for specialist accommodation in Shropshire, as demonstrated by the SHMA, we have concerns as to how such a policy would operate in practice. The policy states that 'a range' of specialist housing will be provided, but it does not specify how much specialist housing that entails on an individual proposal. But in any event, achieving 'a range' of specialist housing on many sites of less than 200-250 dwellings would be extremely challenging. Most sites within the range of 50-250 dwellings would be acquired and developed by a single developer, which would be unlikely to be able to deliver specialist housing such as a care home or extra care accommodation. Clearly however this is balanced by the likelihood that some smaller sites will be acquired by providers of specialist accommodation, and on such sites 100% specialist housing may be delivered.
- 4.23 We therefore consider that the policy should be amended so that on sites of below 250 dwellings, the provision of specialist housing is not obligatory, but could be encouraged. Large strategic sites of 250+ dwellings could maintain a requirement for specialist housing to be provided as part of an appropriate mix. Specific requirements could also be set out in relation to sites where specialist accommodation would be appropriate in part or whole, having regard to the suitability of individual sites and any specific locational needs.

Policy DP2 – Self-build and custom-build houses

- 4.24 Part 1 of the policy states that Shropshire Council will support appropriately located Self-Build and Custom-Build housing developments where they comply with all relevant policies of this Local Plan. SLG is a strong supporter of Self-Build housing and endorses this aspect of the policy.
- 4.25 However, we object to the requirement at part 2 of the policy for all sites of 10 or more dwellings to provide 10% of houses as serviced plots for self-build, as a need has not been demonstrated for this type and scale of provision. Table 131 of the SHMA suggests that around 2,390 applications will be made for inclusion on the Self-Build Register during the plan period. However, the evidence at tables 132 and 133 of the SHMA shows that the supply of such units is exceeding additions to the Self-Build Register. The SHMA sets out the positive steps that the Council has taken to encourage self-build, for which it should be commended. However, as supply is currently outstripping demand by 33% (SHMA, paragraph 11.16) it is not clear why a further policy requirement to deliver self-build plots on all sites above 10 dwellings is needed.
- 4.26 Notwithstanding the above, even if there is unmet demand for self-build plots, there is no evidence that it could be satisfied through the provision of serviced plots on large residential developments. A similar policy relating to the provision of custom and self-build plots was considered through the examination of the Cornwall Local Plan: Strategic Policies. The Council's proposed policy was deleted as it was not supported by sufficient evidence. Paragraph 168 of the Inspector's report states:

"The Council's published change on this policy (J.1, 46) was too prescriptive in requiring larger developments to provide at least 5% of development as serviced plots for self-build/custom-build. There is not yet the evidence to justify this level of prescription and there must be considerable uncertainty as to whether plots on large new housing estates would be attractive to self-build/custombuilders. There are substantial opportunities for self-build/custom-build from the anticipated small site windfalls and the modification to policy 8 to apply the WMS would ensure that plots for 1-5 dwellings do not have to contribute to affordable housing, thus making gaining permission and implementation more straightforward." (emphasis added)

- 4.27 Therefore whilst our client supports the principle of providing plots for custom and self-build development, we consider that the appropriate approach is to firstly identify the scale of demand for such units, and then allocate suitable sites which are specifically put forward for such a use through a call-for-sites exercise. Smaller sites are much better placed to meet the

demand for self-build development, which is likely to be for bespoke units in rural or semi-rural locations, rather than serviced plots within large scale housing developments.

4.28 Without prejudice to our in-principle concerns, the draft policy also contains a requirement to market plots for 36 months at a 'fair plot valuation'. We do not consider this to be a reasonable timeframe for marketing the site, as if there is an immediate need then we would expect the plot to require only a very limited marketing period.

Policy DP11 – Minimising carbon emissions

4.29 The policy sets out a number of requirements, including:

- Part 1(b) of the policy requires all proposals for 10 or more dwellings achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations.
- Part 1(c) requires all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources.
- Part 1(d) of the policy 'strongly encourages' all proposals for one or more dwellings and in particular residential development of 50 or more dwellings to achieve zero net-carbon emissions.

4.30 Whilst the wording of part 1(d) suggests that achieving zero net-carbon is not obligatory, paragraph 4 states:

"The requirements expressed in this policy will apply unless it is demonstrated through open book accounting that they would make the development unviable, having regard to the policy requirements of the Local Plan, in particular the delivery of affordable housing."

4.31 Whilst all of the above requirements (parts 1(b), 1(c) and 1(d)) are clearly well intentioned, they are inconsistent with national planning policy and guidance, which makes clear that the only additional technical requirements exceeding the minimum standards required by Building Regulations that can be sought are the optional technical standards as detailed in the NPPG. These elements of the policy should therefore be deleted.

Policy DP12 – The Natural Environment

- 4.32 Policy DP12(3) requires all developments to 'achieve a 10% net gain in biodiversity in accordance with the Environment Act'. However, the provisions of the Environment Act relating to biodiversity net gain (BNG) have only been consulted upon (numerous objections have been raised) and at this point there is no certainty that it will be carried forward into law.
- 4.33 The Framework sets out a requirement at paragraph 170(d) for planning policies and decisions to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Therefore, to be consistent with national planning policy the draft plan should specify that development should achieve a BNG. However, the Framework does not specify that a certain level of biodiversity net gain should be achieved. The only justification for the 10% figure applied appears to be the emerging Environment Bill.
- 4.34 We are also concerned as to whether the Council has fully assessed the implications of applying 10% BNG on development within Shropshire, including the impact upon the developable areas of site allocations, and potentially development yield. Paragraph 10.28 of the Council's Viability Study assumes that the development cost of achieving a 10% BNG would be £31,000, but it is not clear how this is derived. This figure may be very conservative if the developable area is reduced on sites, as we would expect in some cases.
- 4.35 Furthermore, if 10% BNG is to be required by policy, there is likely to be a need for off-site compensation and offsetting measures to be in place from the adoption of the plan. This would be necessary to ensure that development proposals are not delayed, and to ensure that negotiation is not required with third party landowners. This should be set out and secured within the plan to provide the necessary levels of certainty for developers and the Council that off-site mitigation is available, and that development will not be unduly delayed.
- 4.36 We therefore consider that Policy DP12(3) should be amended to remove reference to 10%. Clearly if the requirement for 10% BNG is introduced through the Environment Bill, then it will be covered by separate legislation in any event and will not need to be addressed within the Local Plan.

5. Policy S11 – Market Drayton Place Plan Area

Housing distribution

- 5.1 The draft plan proposes that Market Drayton should accommodate 1,200 dwellings. Whilst this level of development is broadly supported, it is not clear from the available evidence base as to why certain settlements are to be apportioned higher levels of growth than other settlements within the same tier of the hierarchy. For example, it is proposed that all of the Principal Centres would accommodate dwelling growth of 19-22% save for Bridgnorth (29%, increased from 24% in the Preferred Sites consultation) and Whitchurch (35%). This is shown in the table below:

Principal Centre	Existing dwellings	Proposed distribution	Increase
Bridgnorth	6,189	1,800	29%
Ludlow	5,404	1,000	19%
Market Drayton	5,449	1,200	22%
Oswestry	8,797	1,900	22%
Whitchurch	4,548	1,600	35%

Table 1: Housing growth in the Principal Centres

- 5.2 It should also be noted that 35ha of employment land is allocated in Market Drayton, which is substantially more than the quantum of employment land allocated in all of the other Principal Centres, save for Oswestry where 57ha is allocated. Only 20ha is allocated in Whitchurch. A comparison of the Principal Centres is shown in the table below:

Principal Centre	Employment land allocation	Proposed distribution of dwellings
Bridgnorth	12ha	1,500
Ludlow	7ha	1,000
Market Drayton	35ha	1,200
Oswestry	57ha	1,800
Whitchurch	20ha	1,600

Table 2: Employment and housing growth alignment in the Principal Centres

- 5.3 Therefore, with 35ha of allocated employment development available in Market Drayton, additional housing development in the settlement would be logical in the context of aligning housing and economic growth and delivering a sustainable pattern of development.
- 5.4 Furthermore, Whitchurch already benefits from one significant housing allocation (Tilstock Road). The Council has previously set out concerns that additional allocations could

compromise the delivery of this strategic site³. Market Drayton is the other Principal Centre located in the north-east of the county, and would be well placed to accommodate any growth that cannot be delivered in Whitchurch.

- 5.5 To conclude, whilst we support the identification of Market Drayton as a Principal Centre and the level of growth is broadly supported, we consider that Market Drayton could accommodate a higher level of housing growth. It is a sustainable location for new development, and there are suitable unconstrained sites available for development, in particular to the north of the A53.

Site allocations

- 5.6 The draft plan sets out a development guideline of 1,200 dwellings for Market Drayton. Existing completions and commitments amount to 559 dwellings. After a windfall allowance of 206 dwellings has been applied, there is a residual requirement of 435 dwellings (prior to applying any slippage / flexibility allowances). Consequently, there is a need for additional allocations to meet this requirement.
- 5.7 By way of context, it should be noted that the Neighbourhood Plan for Market Drayton previously reached an advanced stage. The Neighbourhood Plan was to allocate sites to address housing needs to 2026 (the plan period of the adopted Core Strategy and SAMDev). However, the Examiner's report found that the Neighbourhood Plan should not proceed to referendum, with a key reason being that alternative site allocations had not been considered. As the Neighbourhood Plan will now not proceed, all allocations are to be made through the Local Plan Review, which has also considered alternative options through the site selection process and the Sustainability Appraisal (thus overcoming the issues identified by the Neighbourhood Plan Examiner).
- 5.8 A summary of our position in relation to the proposed draft allocations is set out below, before we provide further details in relation to site MDR006 which is controlled by SLG.

³ Paragraph 21.8 of the Preferred Sites consultation document

Sites MDR012 (Land to the east of Maer Lane and north of the A53) & MDR034 (Land west of Maer Lane and north of the A53)

- 5.9 We do not object to the principal of allocating the land west and east of Maer Lane for residential development. There is a residual housing requirement which cannot be met on our client's land alone.
- 5.10 While the principle of a new marina in the town is supported, the complexity of delivering such a project alongside a housing development means it could be some time before the first homes are occupied. This is reflected in Appendix 7 of the plan, which identifies that the sites will deliver in the medium – long term. Therefore to ensure that the Council are able to maintain a five-year supply of housing land, it is important that provision is made through other allocations within Market Drayton for deliverable sites free of constraint, which are capable of coming forward early in the plan period.

Site MDR039 & MDR043 (Land at Longford Turning)

- 5.11 We do not object to the principal of allocating the land at Longford Turning for residential development. There is a residual housing requirement which cannot be met on our client's land alone.
- 5.12 The site was proposed as a draft allocation in the Market Drayton Neighbourhood Plan. However, the delivery of the site for the playing fields is reliant upon land in third party ownership, and furthermore any planning application involving the provision of new playing fields is likely to be extremely complex. It is not clear whether there is sufficient evidence to justify the site being identified for delivery within the short term, as suggested in Appendix 7 of the draft plan.
- 5.13 Having regard to the above considerations, it is important that provision is made through other allocations within Market Drayton for deliverable sites free of constraint, which are capable of coming forward early in the plan period.

Site MDR006 (Land adjoining Adderley Road)

- 5.14 We strongly support the allocation. The site is controlled by SLG, and is considered to be deliverable in the first 5 years of the plan period. A full analysis of the site is provided in Section 6 below.

6. Site MDR006 - Land adjoining Adderley Road, Market Drayton

Introduction

- 6.1 SLG is promoting the land adjoining Adderley Road, Market Drayton as an allocation for residential development. The site is proposed as a draft allocation in the draft plan (site ref: MDR006). A site location plan showing the land under our client's control is provided at Appendix EP1.
- 6.2 The site is being promoted by SLG, a company with an established track record of delivering sites of this nature. It is therefore available for development. The site can contribute to meeting the housing requirement for Market Drayton set by the plan.
- 6.3 A vision document has previously been submitted to the Council, presenting a thorough analysis of the site context and the technical considerations for developing the site. A range of technical assessments have been used as the basis for identifying constraints and opportunities, in order to develop an illustrative layout that compliments the characteristics of the site and the relevant technical considerations as identified through assessments. Those technical assessments have also previously been submitted to the Council.
- 6.4 The site has been promoted through the Local Plan Review process as a proposed allocation for residential development. It is considered to represent an extremely logical location to accommodate the future development requirements of Market Drayton.

Site location and description

- 6.5 The site is located to the north of Market Drayton, approximately 300m north of the town centre as defined on the current proposals map.
- 6.6 The site is bordered to the south by the A53 and an existing dwelling (known as Westways); to the east by the A529 with an employment area, dwelling and agricultural fields beyond; to the north by agricultural fields with an existing dwelling (known as Rosemount) beyond; and finally to the west by agricultural fields.
- 6.7 The site comprises approximately 4.55 hectares of managed grassland, currently used for agricultural grazing, bordered by hedgerows and trees. The land is generally flat, although there

is a gentle slope from south to north away from the A53, with higher ground beyond the boundaries of the site to the north and west.

- 6.8 The site is located on Adderley Road which is a key route into Market Drayton, just 300m north of the designated town centre. Existing pedestrian facilities at the A53 / A529 Adderley Road roundabout can be upgraded to enhance pedestrian connectivity. These improvements would benefit not only the land adjoining Adderley Road, but also users of the existing Gingerbread Man public house and employment land at Western Way / Burnside Road.
- 6.9 Furthermore, whilst other draft allocations in Market Drayton are located adjacent to allocated employment land, the land adjoining Adderley Road is located adjacent to the existing employment land at Western Way / Burnside Road, providing certainty of co-location with employment opportunities for future occupiers.

SLAA assessment

- 6.10 The site is assessed in the 2018 SLAA under reference MDR006. It is assessed as being a 'Long Term Potential SLAA Residential Site'.
- 6.11 The SLAA identifies an indicative capacity of 137 dwellings for the site. The conclusion of the SLAA in relation to residential development is as follows:

"The site falls outside of the development boundary. As such open market residential development is contrary to policy. However, the site may have long term potential subject to appropriate policy changes and management of any physical, heritage and environmental constraints present. For instance the site is located to the north of the A53 and west of the A529. These are significant physical barriers which will require due consideration. The ability to provide an appropriate access into the site is subject to highway approval."

- 6.12 Consequently the site is identified as potentially suitable for an allocation, subject to further assessment. The constraint identified - i.e. connectivity to the town centre due to the road network - is addressed in detail below and in the Transport and Access Review prepared by SCP and previously submitted to the Council. In summary, the existing pedestrian facilities at the A53 / A529 Adderley Road roundabout can be upgraded to improve pedestrian linkages into Market Drayton. This would include the provision of new sections of footway along with the introduction of a signal controlled crossing on the A53 western arm of the roundabout.

Directions for growth in Market Drayton

- 6.13 The SAMDev allocated land at Rush Lane (east and west) for 314 dwellings (site ref: MD030) and the adjacent land between Croft Way and Greenfields Lane for 76 dwellings (site refs: MD010 and MD028). These sites comprised a logical infilling between the urban area and the A53 to the north. However, now that those sites are committed, the options for future growth in the settlement are limited. The south of the settlement is heavily constrained by the River Tern including its associated floodplain, which acts as a natural barrier. Consequently, paragraph 4.114 of the SAMDev explicitly recognises that future growth in Market Drayton will be to the north of the settlement:

“Given the high landscape value and environmental constraints to the south of the town, future growth, further to Policy MD3, will be focused in the north of the town on sustainable sites adjoining the development boundary and subject to suitable access off the A53.” (emphasis added)

- 6.14 This position is also reinforced by the Council's Landscape and Visual Sensitivity Study (LVSS), which assesses 3 parcels around Market Drayton. The two parcels to the north of the A53 (04MKT-A and 04MKT-C) are both assessed as being of medium-low landscape sensitivity and medium visual sensitivity for housing development. However the parcel to the south of the settlement (04MKT-B) is assessed as being of high landscape and visual sensitivity for housing.
- 6.15 Therefore in conclusion, the only logical direction for future growth in Market Drayton is to the north of the settlement. As this is specifically recognised within the SAMDev, the allocations follow a logical long-term strategy and a plan-led approach.

Site selection process

- 6.16 The Council has undertaken Site Assessments to inform the identification of proposed housing and mixed-use allocations within the Local Plan Review. The report identifies that it is appropriate to deliver the necessary growth in Market Drayton through a range of moderate scale sites rather than propose a single large scale allocation. We agree with the proposed approach which would deliver an appropriate balance between delivering the housing requirement and essential infrastructure, particularly in the context of CIL which already operates in Shropshire.

- 6.17 The land adjoining Adderley Road is assessed in the Site Assessments report (Appendix L of the Sustainability Appraisal) under reference MDR006. The report recommends that the site is taken forward as a preferred allocation. The Council's summary reasoning is as follows:

“The site is well contained by the natural field pattern and represents an appropriately scaled extension to Market Drayton to complement the other preferred sites coming forward to support the aspirations of the Neighbourhood Plan process. Whilst the site represents an extension to the town to the north of the A53, it is recognised this is a natural progression of the town given the sparsity of options within the by-pass. The site, alongside MDR39/43 effectively works to book-end the parcels of land surrounding the A53 west of the Gingerbread Man Roundabout. This supports the maintenance of significant areas of open countryside north of the A53, maintaining 'edge of town' character for much of the route, whilst also enabling the delivery of necessary housing. The site has medium visual and medium-low landscape sensitivity to development. Highways access should be onto the A525 and not the A53 because of the need to minimise the number of junctions onto the A53 and avoiding another junction between Rush La and Adderley Rd roundabout. The adjacent ponds will need to be adequately buffered, reducing the developable area available.”

- 6.18 The report recommends the following design requirements for the allocation:

“Vehicular access through the introduction of a priority controlled junction onto A529 Adderley Road. Pedestrian / cycle linkages into Market Drayton will be upgraded, including the provision of two new sections of footway along with the introduction of a signal controlled pedestrian crossing on the A53 western arm of the roundabout.”

- 6.19 We largely agree with the assessment of the MDR006 in the Site Assessments report. A range of technical assessments have been previously submitted to support the proposed allocation of our client's site. These are summarised below.

Technical considerations

Highways and accessibility

- 6.20 The site has been assessed from a highways and accessibility perspective by SCP. The conclusions of their review are summarised below.
- 6.21 The site benefits from good levels of accessibility by foot, cycle and public transport. In particular, the site has been shown to be within easy walking distance of Market Drayton Town Centre and associated facilities, along with bus stops and the bus station. These provide viable

sustainable travel opportunities for prospective residents which would help to reduce reliance on travel by the private car.

- 6.22 Vehicular access to the proposed allocation site can be achieved through the introduction of a simple priority controlled junction on the A529 Adderley Road. The proposed access provides levels of visibility which exceed the design speed of the road and can accommodate the movements of a large refuse vehicle.
- 6.23 In the vicinity of the site, the A529 Adderley Road is predominantly rural in character and subject to National Speed limit. However, residential development on this site would change the nature of this section of Adderley Road and increase activity. It is therefore considered appropriate to reduce the speed limit along the site frontage to either 30mph or 40mph, the principle of which has previously been accepted by the Highway Authority as part of the previously consented Sainsbury's development.
- 6.24 In order to improve pedestrian linkages into Market Drayton, the existing pedestrian facilities at the A53 / A529 Adderley Road roundabout would be upgraded. This would include the provision of new sections of footway along with the introduction of a signal controlled crossing on the A53 western arm of the roundabout. The proposed improvements to the A53 / A529 Adderley Road roundabout would increase pedestrian connectivity, and would not only benefit the land adjoining Adderley Road, but also connectivity to the existing employment land at Western Way / Burnside Road and existing residences along Adderley Road.
- 6.25 There is therefore no reason in highways terms why the site could not be developed.

Landscape and Visual Impact

- 6.26 The site is an agricultural field located on the current edge of the urban area. It has an edge of settlement character and is contained by roads and existing development on two boundaries. The land rises beyond the northern and western boundaries resulting in a tightly constrained visual envelope, with few long range views of the site.
- 6.27 The Council's LVSS for Market Drayton sets out specific design guidance for future development in Market Drayton, including constraints, areas of higher landscape / visual sensitivity and areas where development should not take place. The plan at page 14 of the Market Drayton LVSS identifies that the higher ground to the north and west of the subject site should not be

developed. However, the LVSS does not identify any specific landscape constraints for site MDR006. An extract from the document is shown below:

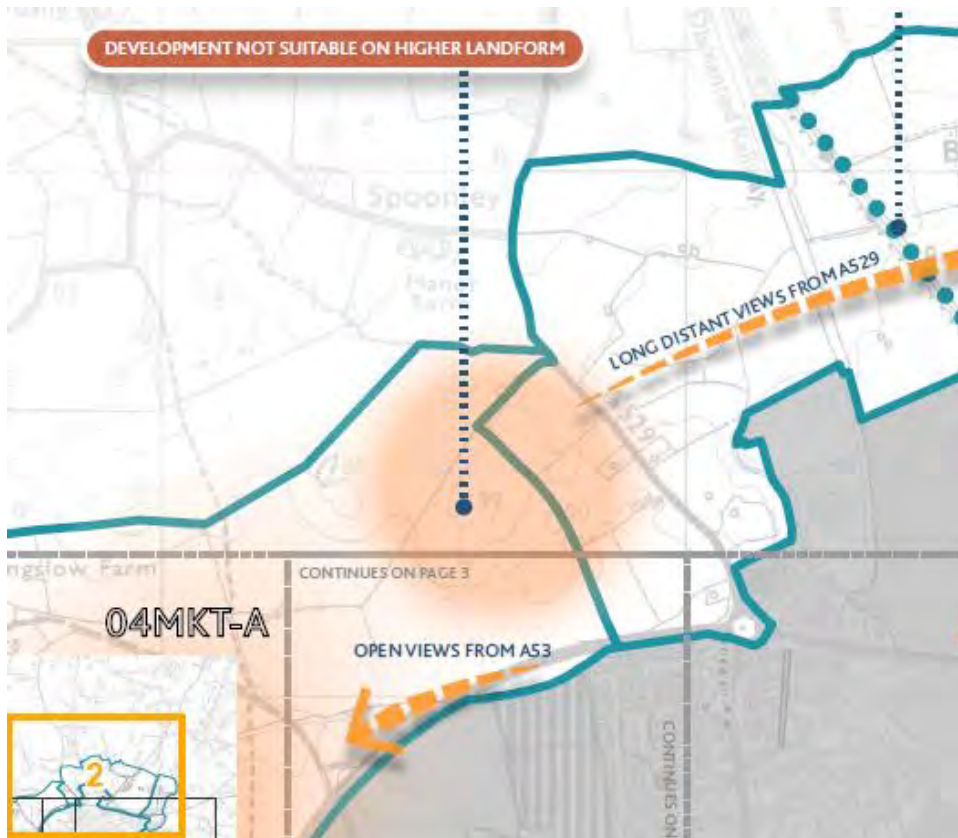


Figure 1: Extract from the Market Drayton LVSS

- 6.28 Hedgerows border the land to all sides, interspersed with a number of large trees. These features provide defensible boundaries and a strong sense of containment. This could be supplemented through a comprehensive landscaping scheme.
- 6.29 There are no public footpaths through the site or immediately adjacent to it, save for the footway adjacent to Adderley Road. Views of the site are largely limited to close range ones from Adderley Road, and glimpsed views for passing traffic on the A53.
- 6.30 The development of any greenfield site will inevitably result in a change to the landscape character. It is the impact of that change which needs to be considered. In this case, the development of the site would not be incongruous in the location and setting at the edge of the settlement. It would fit in with the existing urban fringe character created by the road

network, the built form of the Burnside Business Park and the existing residential properties of Westways, The Woodlands, Woodlands Cottages and Rosemount.

- 6.31 The site would retain its key character elements of hedgerows and hedgerow trees, maintaining much of the visual screening already afforded the site. This could be reinforced by additional planting along the Adderley Road frontage.
- 6.32 There is little visual relationship between the wider landscape and the site due to the topography, built form and intervening vegetation, which all limit views directly into the site.
- 6.33 There are therefore no landscape or visual impact reasons why the site could not be developed. The development of the site accords with the LVSS.

Ecology

- 6.34 A Preliminary Ecological Appraisal of the site has been carried out by FPCR. The conclusions of the appraisal are summarised below.
- 6.35 The site is presently used for grazing and consequently largely comprises semi-improved grassland that is species poor. No statutorily protected or non-statutorily protected sites exist on the site or immediately adjacent to it. No statutorily protected sites exist within 2km of the site.
- 6.36 The main features of ecological value within the site are the existing hedgerows and trees (some of which offer bat roosting potential) and an ephemeral pond adjacent to the northern boundary. All of these features could be retained as part of any development. Some hedgerow may need to be removed to facilitate access to the site; however adequate mitigation can be provided at detailed design stage in the form of additional hedgerow planting.
- 6.37 A pond immediately beyond the northern boundary of the site has been surveyed for Great Crested Newts (GCN), and a small population is present. We note that the potential for GCN mitigation in the form of a buffer area is already factored into the Council's evidence base in the Site Assessment report. The precise details would be agreed at the planning application stage.
- 6.38 There are therefore no ecological reasons why the site should not be developed.

Agricultural land classification

- 6.39 An assessment of the site's agricultural land quality has been carried out by Hinson Parry & Company. The assessment concludes that the site is sub-grade 3B. The site therefore does not comprise 'best and most versatile' agricultural land.

Ground Conditions

- 6.40 A Phase 1 Geoenvironmental Assessment of the site has been carried out by Lees Roxburgh. The report concludes that the site is greenfield, and is not known to be subject to any adverse ground conditions or contamination that would preclude development.

Noise

- 6.41 The Council's Site Assessment report identifies that the A53 to the south of site and A529 to the east are significant noise sources. It is well established that residential development can be accommodated adjacent to existing roads, which tend to provide a consistent noise source and can therefore be mitigated against through design and mitigation. Potential mitigation is proposed in the Council's Site Assessment report (Appendix L to the Sustainability Appraisal), in the form of stand-off distance, glazing and ventilation consideration and layout and orientation of dwellings to the road.
- 6.42 There are therefore no acoustic reasons why the site should not be developed.

Flood Risk and Drainage

- 6.43 Lees Roxburgh has carried out an initial drainage assessment for the site. The conclusions of the appraisal are summarised below:
- The site is located within Flood Zone 1 where the risk of flooding is considered to be low.
 - An existing watercourse can be found adjacent to the site's southern boundary, while surface water sewers are also present in the area.
 - There are foul drainage systems in the area to which connection could be achieved subject to agreement with Severn Trent Water.
 - There are surface water drainage systems in the area to which connection should be achievable subject to further investigation.

- 6.44 Whilst the Council's Site Assessment report identifies that parts of the site falls within the 1 in 100 and 1 in 30 year surface flood risk zone, this matter can be addressed through a detailed drainage scheme at the detailed design stage, including surface water attenuation as required.
- 6.45 There are therefore no flood risk or drainage reasons why the site could not be developed.

Services

- 6.46 Searches of the main utilities providers have been carried out by Lees Roxburgh. These have confirmed that all main services are available in this locality, and that connections can be made to the site.

Viability and deliverability

- 6.47 In any Local Plan process, it is essential to ensure that the range of sites available for development includes those that are free of constraint and can be delivered quickly. That ensures a five-year supply of housing land can be demonstrated from the start of the plan period and reflects the Government's intentions to significantly boost the supply of new homes. That is particularly true in Market Drayton where the complexity of the other proposed housing allocations could result in them being slow to start delivering new homes. The land adjoining Adderley Road has no such constraints and is deliverable now.
- 6.48 The site is under the single control of SLG, including all land required for access. If the site is allocated, SLG's intention would be to submit an outline planning application for residential development immediately upon adoption of the plan. Once outline planning permission is achieved, the site would then be immediately marketed and sold to a developer.
- 6.49 SLG has undertaken an internal development appraisal of the site allowing for a policy compliant level of affordable housing, and it is considered to be viable. The site is greenfield and there are no known constraints on the land that would affect delivery. Relevant technical matters have been considered and are addressed within the technical reports as described above.
- 6.50 The site is considered to be available and suitable for development in the short term, subject to achieving planning permission. To provide further evidence of the site's deliverability, SLG would

be open to submitting an early planning application in advance of the plan being adopted, if such an application was invited or likely to be supported by the Council.

Capacity

- 6.51 The draft allocation is for approximately 125 dwellings. We consider that this quantum of development is realistic and is therefore supported. However, the capacity could be increased if the Council considered that a higher density development would be more appropriate.
- 6.52 The 2018 SLAA identifies an indicative capacity of 137 dwellings for the site. The previously submitted illustrative layout took into account the technical work commissioned by SLG, as discussed above, and demonstrates that the site can accommodate approximately 131 new homes, including affordable housing. This accounts for a policy compliant level of public open space (amounting to almost 10% of the gross site area), and the retention of key features such as trees and hedgerows.

7. Sustainability Appraisal

- 7.1 It should be noted from the outset that the Sustainability Appraisal process is a numerical exercise which fulfils a legal requirement to assess reasonable alternatives. It cannot replicate (nor is it intended to do so) a planning balance exercise, which involves the weighing of numerous quantitative and qualitative planning considerations, and should not be used as the sole or main methodology for the selection of policies or site allocations in the emerging plan. In this regard we note that the Council has correctly only used the Sustainability Appraisal as one tool to assess environmental impacts and reasonable alternatives. Assessing matters such as accessibility to services or impact on a listed building require a far more considered appraisal than a simple scoring based upon proximity to certain features.
- 7.2 Notwithstanding the above, we note that the Sustainability Appraisal is referred to in the Council's Site Assessment report, and consequently it is important that the Sustainability Appraisal correctly assesses each site.
- 7.3 In relation to our client's land adjoining Adderley Road, Market Drayton (site ref: MDR006), the Sustainability Appraisal incorrectly assesses the site as being best and most versatile agricultural land. However as set out above, an assessment of the site's agricultural land quality has previously been carried out by Hinson Parry & Company. The assessment concludes that while conditions vary across the site, overall it should be considered to be sub-grade 3B. The site therefore does not comprise 'best and most versatile' agricultural land. Consequently, the negative score in category 6 against site MDR06 should be revised to a '0'. We have raised this point in previous representations including the recent Regulation 18 consultation.
- 7.4 If the land adjoining Adderley Road, Market Drayton (site ref: MDR006) is correctly assessed as a '0' under criterion 6, the total score for the site would be revised from -4 to -3. Whilst this would remain as 'fair' overall against the Sustainability Appraisal methodology, a score of -3 would be equal to or better than all other options for allocation in the settlement which are not removed from the site selection process due to site size or other reasons (such as availability).
- 7.5 Notwithstanding the relatively minor discrepancy identified above, the Sustainability Appraisal appears to be a robust document on the whole which adequately assesses the site allocations and reasonable alternatives.

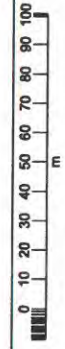
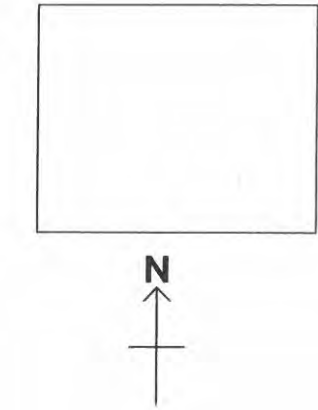
8. Summary and conclusions

- 8.1 The land adjoining Adderley Road, Market Drayton is proposed as an allocation for a residential development of approximately 125 dwellings in the draft plan (site ref: MDR006). We strongly support the allocation of the site for residential development. The Council has undertaken a robust approach to the selection of allocations in the plan. **The Council's Site Assessments report** recommends that the site is taken forward as an allocation.
- 8.2 The only logical direction for future growth in Market Drayton is to the north of the settlement, and this is specifically recognised within the SAMDev. The land adjoining Adderley Road is a highly accessible and extremely logical location to accommodate growth, being located just 300m north of the town centre. The existing pedestrian facilities at the A53 / A529 Adderley Road roundabout can be upgraded to improve pedestrian linkages into Market Drayton. These improvements would benefit not only the land adjoining Adderley Road, but also users of the existing employment land at Western Way / Burnside Road.
- 8.3 Other draft allocations in Market Drayton have complex infrastructure requirements. It is therefore critically important that provision is made through allocations within Market Drayton for deliverable sites free of constraint, which are capable of coming forward early in the plan period. That will ensure the Council to demonstrate a five-year supply of delivering housing land throughout the Plan period. The land adjoining Adderley Road has no such constraints and is deliverable now.
- 8.4 A vision document has previously been prepared and submitted to the Council. It presents a thorough analysis of the site context and the technical considerations for developing the site, underpinned by a series of technical reports. **The Council's evidence base is consistent with the information gathered by SLG in support of the allocation.** The Site Assessments report for Market Drayton provides a robust basis on which the Council has selected the site allocations.
- 8.5 Therefore, to conclude, these representations demonstrate that the allocation of the site is justified, and the site is deliverable in the next 5 years with no technical constraints.

9. Appendices

EP1. Site location plan – land adjoining Adderley Road, Market Drayton

EP1



OS MasterMap 1250/2500/10000
 scale
 07 October 2016, ID:
 BLJT-00566640
www.planningapplicationmaps.co.uk

1:2500
 scale
 print
 at
 A3,
 Centre:
 367100
 E,
 335364
 N

©Crown
 Copyright
 and
 database
 rights
 2016
 OS
 100019980



Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex** and there is a need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: Mr John Coxon

Date: 26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="DP1"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).*

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: Mr John Coxon

Date: 26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="DP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).*

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP11	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.**

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP12	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S11"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).*

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------------------	-------	----------------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).*

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex** and there is a need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	MDR012 & MDR034	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------	-------	-----------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr John Coxon – Emery Planning (Agent) on behalf of The Strategic Land Group Ltd
------------------------	--

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	MDR039 & MDR043	Policies Map:	<input type="text"/>
------------	----------------------	---------	----------------------	-------	-----------------	---------------	----------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|-------------------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).*

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see supporting statement.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to attend the hearings to make oral submission, respond to the Inspectors **questions and respond to the Council's case. The issues are complex and there is a** need for detailed examination of the evidence.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Mr John Coxon

Date:

26/01/2021

Office Use Only

Part A Reference:

Part B Reference: