Shropshire Council: Shropshire Local Plan

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:	Stuart Morgans, Sport England

Q1. To which document does this representation relate?

- [x] 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:	S11.1	Site:		Policies Map:	

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

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

(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.

S11.1 Market Drayton. Sport England notes the modification made to part 3 of the policy which refers to the replacement sports facilities at Longford Turning to be provided to at least equitable standard. To fully align with para 97 of the NPPF and the proposed wording of Policy DP15 (Open Space and recreation), it is recommended that the wording be modified further to ensure the replacement facilities are equitable in quantity and quality in a suitable location.

Sport England supports the intention of the housing allocation to provide a suitable means of access to the replacement sports facilities, to ensure this is convenient and safe for walking and cycling as well as to provide vehicular access to the site.

As per Sport England's representations at Reg 18 stage, Sport England's concerns relate to the apparent uncertainty regarding viability of the relocation, as this does not demonstrate the proposal is deliverable in line with the guidance in the NPPF.

see separate sheet.

(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.

Revise the policy wording to ensure that the replacement sports hub at Longford Turning is to be equitable in quantity and quality to accord with para 97 of the NPPF, and to accord with proposed policy DP15 (open space and recreation).

Address the issue of viability to relocate the existing sports hub from Greenfields to Longford Turning in line with the guidance in the NPPF, and revise the wording of part 3 of the policy accordingly, or alternatively remove the allocation from the Plan if viability of the relocation cannot be demonstrated.

Revise the proposals map to specifically allocate sufficient land for the proposed sports hub relocation (rather than the current less precise proposal to show a broad location for relocation), supported by feasibility assessment that demonstrates the replacement land to be equitable in quantity in accordance with para 97 of the NPPF.

(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.

- [x] 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:

N/A

(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: Stuart Morgans

Date: 19/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Shropshire Local Plan Regulation 19 : pre-Submission Draft Consultation

Additional Comments by Sport England

S11.1 Market Drayton

The NPPF sets out in para 16b that plans should be prepared positively in a way that is aspirational but deliverable. In addition, para 34 of the NPPF sets out that Plans should set out the contributions from development, and that such policies should not undermine the deliverability of the plan. Para 57 sets out that where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. The uncertainty regarding deliverability in this case leads to concerns that this proposal is not in accordance with this guidance in NPPF.

The uncertainty regarding deliverability potentially undermines continued use and investment in the existing Sports Club site who may find it difficult to secure grant funding due to the uncertainty regarding potential future relocation. To address this, it is recommended that either the proposals are revised to demonstrate they are deliverable, or the allocation is removed from the Plan.

The policy map only identifies a broad location for proposed relocation to Longford Turning. This is insufficiently precise to demonstrate that the relocation of the sport facilities will provide equitable provision in quantity in accordance with para 97 of the NPPF. To address this, a specific site should be allocated for sports development, identifying the overall area (ie. square metres) of land to be provided to demonstrate that this allocation would be equitable in quantity (ie. area) to re-provide the existing pitches, courts, and ancillary facilities at Greenfields. Consideration should also be given to allocating additional land to facilitate future growth of the sports hub. This should be supported by a feasibility assessment to demonstrate that the land is capable of providing the replacement sports pitches and associated facilities, taking into account any technical constraints such as levels, soil profiles, drainage etc, to accord with Sport England's guidance contained with "Natural Turf for Sport". https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/natural-turf-for-sport.pdf