

### 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)**.

making effective i	ергезептан	0115.						
Part B: Re	presen	tatio	n					
Name and Orga	anisation:		Fifer, Plann & River Trus		ager			
Q1. To which d	ocument	does t	his repres	entatio	n relate?			
<b>✓</b> Regulation	19: Pre-Sub	mission	Draft of the	Shropsh	nire Local Plan	1		
Sustainabili Local Plan	ty Appraisa	l of the I	Regulation 1	9: Pre-S	ubmission Dra	aft of t	he Shr	opshire
Habitats Re Shropshire (Please tick	Local Plan	ssessme	nt of the Re	gulation	19: Pre-Subm	nission	Draft (	of the
Q2. To which p	art of the	docun	nent does	this re	presentatio	n rela	ate?	
Paragraph:	F	Policy:	DP10	Site:		Po	olicies Map:	
Q3. Do you cor Shropshire Loc		_	ation 19:	Pre-Sub	omission Dr	aft of	f the	
A. Legally comp	oliant			Yes:	$\overline{\checkmark}$	No:		
B. Sound				Yes:	$\overline{\checkmark}$	No:		
C. Compliant w (Please tick as	•		perate	Yes:	$\checkmark$	No:		
Q4. Please give Draft of the Sh fails to comply If you wish to supp of the Shropshire L set out your comm	ropshire I with the ort the legal ocal Plan or	Local P duty to complia	lan is not co-opera	legally ite. Plea dness of t	compliant ase be as p he Regulation	or is reciso 19: Pr	unsou e as p e-Subm	ind or ossible. nission Draft
Minor changes to understanding of	explanator					id clar	ity and	

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.

Point 5 of Policy DP10 refers to proposals for new marinas being required to demonstrate the capability of the canal network to accommodate the development. Such as requirement is welcomed as, in order to physically connect to its canal network, new marinas must first obtain the necessary connection agreement from the Trust, consideration of which is based on the ability of the network to accommodate the proposal in terms of availability of water resources, navigational safety considerations and potential impacts on SSSIs.

Minor changes to wording within the explanatory text of Policy DP10 would help to clarify how this requirement can be met and the applicant able to demonstrate the capability of the canal network to accommodate the development. This could either be in the form of advice to applicants to undertake pre-application discussions on this matter with the Canal & River Trust, consistent with paragraph 40 of the NPPF, or for the applicant to provide evidence of the Trusts agreement to any necessary connection.

It is considered that such an amendement would aid clarity and understanding of Policy DP10 and improve its effectiveness.

(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.

$\overline{\checkmark}$	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:

Whilst it is not considered necessary to participate in a hearing session in respect of this matter we would be happy to do so if this would assist .

Office Hee Only	Part A Reference:
Office Use Only	Part B Reference:

(Please continue on a separate sheet if necessary)

those who have indicated that they	etermine the most appropriate procedure wish to participate in hearing session(s) when the Inspector has identified the ma	. You may be asked
Signature:	Date:	25/02/2021

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)**.

making circ	ctive represer	reactions.						
Part B:	Repres	entati	on					
Name an	d Organisatio		e Fifer, Planr & River Trus		iger			
Q1. To wh	ich docume	ent does	this repres	entatio	n relate	?		
Regu	lation 19: Pre	-Submissio	n Draft of the	e Shropsh	nire Local	Plan		
Susta Local	inability Appr Plan	aisal of the	Regulation 1	l9: Pre-S	ubmissior	n Draft of t	the Shro	pshire
☐ Shrop	ats Regulatior shire Local Pl se tick one bo	an	ent of the Re	gulation	19: Pre-S	Submission	Draft o	f the
Q2. To wh	ich part of	the docu	ment does	this re	presenta	ation rel	ate?	
Paragraph:	4.138	Policy:	DP14	Site:		P	olicies Map:	
	u consider e Local Plai	_	lation 19:	Pre-Sub	missior	n Draft o	f the	
A. Legall	compliant /			Yes:	$\overline{\checkmark}$	No:		
B. Sound				Yes:	$\checkmark$	No:		
•	iant with the I ick as appropr	•	operate	Yes:	$\checkmark$	No:		
Draft of the fails to condition of the Shrop.	e give detaine Shropshimply with to support the shire Local Plan	re Local I he duty t	Plan is not to co-opera ance or sound	legally ate. Plea dness of t	<b>complia</b> ase be a he Regula	ant or is is precis tion 19: Pr	unsou e as po e-Subm	nd or ossible. ission Draft
	ges to explan P14 and there				would aid	d clarity ar	nd unde	rstanding

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.

forward	your suggested revised wording of any policy or text.	Please be as preci	ise as possible.
The C	anal & River Trust is generally supportive of the prin	ciples set out in	Policy DP15.
refere	owever requested that paragraph 4.138 of the explance to the canal network in its examples of blue infred tructure to assist with clarity and understanding.	-	
	(Please cont.	inue on a separat	te sheet if necessary)
suppor	e note: In your representation you should provide suting information necessary to support your representation(s). You should not assume that you will have ssions.	tation and your s	uggested
	this stage, further submissions may only be ma on the matters and issues he or she identifies		
Subm partic Please	f your representation is seeking a modification braft of the Shropshire Local Plan, desipate in examination hearing session(s)?  In note that while this will provide an initial indication of the first point to confirm you	of your wish to pa	er it necessary to
$\overline{\mathbf{V}}$	No, I do not wish to participate in hearing session(		
	Yes, I wish to participate in hearing session(s) (Please tick one box)		
_	you wish to participate in the hearing sessonsider this to be necessary:	sion(s), please	e outline why
those v	e <b>note:</b> The Inspector will determine the most approwho have indicated that they wish to participate in heirm your wish to participate when the Inspector has	priate procedure earing session(s)	. You may be asked
Signatı	ure:	Date:	25/02/2021
		Part A Reference	

Office Use Only

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)**.

making enective representations.	
Part B: Representation	
Name and Organisation: Debbie Fifer, Planning Manager Canal & River Trust	
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	<b>3</b>
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: DP18 Site: Policies Map:	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:	
A. Legally compliant Yes: V	
B. Sound Yes: V No:	
C. Compliant with the Duty to Co-operate Yes: V No: (Please tick as appropriate).	
Q4. Please give details of why you consider the Regulation 19: Pre-Submis 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 of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this be	<b>le.</b> Draft
set out your comments.	
Minor changes to the explanatory text, consistent with NPPF, and policy title would aid cla and understanding of Policy DP18 in respect of land stability and thereby increase effectiveness.	rity

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.

The Canal & River Trust is generally supportive of Policy DP18 and in particular reference to land instability in point 6.

Land stability and the consideration of the suitability of development with regard to ground conditions are material planning considerations and paragraph 178a and 179 of the NPPF require that a site is suitable for its proposed use taking account of any risks arising from land instability and that responsibility for securing a safe development rests with the developer and/or landowner.

The explanatory text to Policy DP18 could usefully be expanded to provide further clarification on this matter, including examples of where such requirements could apply, more consistent with the approach taken in respect of other elements of the policy. It is, for example, often not recognised that construction work in proximity to canals can adversely affect the stability of cuttings and embankments, impacting on the structural integrity of the canal corridor and associated infrastructure which could result in in a breach of the canal.

You may also wish to consider whether the policy title should be widened to include refence to ground conditions in recognition of the wider issues addressed, to assist users of the plan to identify this as a relevant policy for land stability and consistent with NPPF section headings.

(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.

	, , , , , , , , , , , , , , , , , , , ,
$\checkmark$	No, I do not wish to participate in hearing session(s)
	Yes, I wish to participate in hearing session(s) (Please tick one box)
07 T4	
_	f you wish to participate in the hearing session(s), please outline why consider this to be necessary:
_	
_	

Office Use Only	Part A Reference:
Office Use Only	Part B Reference:

(Please continue on a separate sheet if necessary)

those who have indicated that the confirm your wish to participal examination.	hey wish to participate in hea	nring session(s).	You may be asked
Signature:		Date:	25/02/2021

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)**.

making effective represei	ntations.		
Part B: Repres	entation		
Name and Organisatio	n: Debbie Fifer, Pla Canal & River Tr		
Q1. To which docume	ent does this repr	esentation relate?	?
Regulation 19: Pre-	-Submission Draft of t	the Shropshire Local I	Plan
Sustainability Appr Local Plan	aisal of the Regulation	n 19: Pre-Submission	Draft of the Shropshire
Habitats Regulation Shropshire Local Pl	an	Regulation 19: Pre-S	ubmission Draft of the
Q2. To which part of	the document doc	es this representa	tion relate?
Paragraph:	Policy: DP28	Site:	Policies Map:
Q3. Do you consider Shropshire Local Plan	_	: Pre-Submission	Draft of the
A. Legally compliant		Yes: 🗹	No:
B. Sound		Yes: 🗹	No:
C. Compliant with the l	,	Yes: 🗹	No:
Draft of the Shropshi fails to comply with t If you wish to support the	ire Local Plan is no the duty to co-ope legal compliance or sou	ot legally complia erate. Please be as undness of the Regulat	ion 19: Pre-Submission nt or is unsound or s precise as possible. ion 19: Pre-Submission Draft te, please also use this box to
Minor changes to ex DP28.	planatory text wou	uld aid clarity and	effectiveness of Policy

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.

Whislt the Trust broadly welcomes point 3(b) of Policy DP28 it questions the phrasing of the sentence which would appear to indicate that whislt footways, cycleways, public rights of way and bridleways should be protected for active travel, canals are somehow different providing local transport routes to home, work, services and leisure. The following minor rewording of Policy DP29 (b) is suggested:

"b. Protection, extension or improvement of footways, cycleways, public rights of way, canal towpaths and bridleways for active travel and to provide local transport routes to home, work, services and leisure"

Reference in paragraph 4.252 to developer contributions to improvements in transport networks with reference to footways, cycleways, roads etc should be expanded to include reference to canal towpaths. Where development occurs in proximity to our waterways this can lead to a significant increase in the use of towpaths. This may require improvements to the existing towpath surface or access points to safely accommodate such use. We are therefore keen to ensure that new development mitigates any potential adverse impact on towpaths and maximise opportunities for their use where appropriate and meeting the necessary statutory tests for planning obligations.

(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.

$\overline{\checkmark}$	No, I do not wish to participate in hearing session(s)
	Yes, I wish to participate in hearing session(s)
	(Please tick one box)
_	you wish to participate in the hearing session(s), please outline why
you c	onsider this to be necessary:
you c	onsider this to be necessary:
you c	onsider this to be necessary:
you c	onsider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

(Please continue on a separate sheet if necessary)

<b>Please note:</b> The Inspector will determine those who have indicated that they will to confirm your wish to participate whe examination.	sh to participate in hearing session	(s). You may be asked
Signature:	Dat	re: 25/02/2021

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)**.

making enective representations.
Part B: Representation
Name and Organisation: Debbie Fifer, Planning Manager Canal & River Trust
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: S8.1 Site: Policies Map:
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:
A. Legally compliant Yes: V
B. Sound Yes: V No:
C. Compliant with the Duty to Co-operate Yes: V 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.
The addition of new text within the Development Strategy will provide some degree of clarity in respect of future aspirations for the long term sustainable re-use of Ellesmere Yard, thereby planning positively for such reuse and improving the plans effectiveness.

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.

S8.1 sets out the development strategy for Ellesmere. The Trust asks that reference is included within this to the future sustainable reuse of Ellesmere Yard.

Ellesmere yard contains a historically significant cluster of canalside buildings situated on the canal junction and within the Ellesmere Conservation Area. They were described in the North Shropshire Conservation Apprasial as comprising 'the best preserved canal workshop in Britain'. The uses for which the buildings were designed are however nolonger appropriate to fulfil the operational needs of the canal and to safeguard the buildings going forward it is necessary to ensure that a long term sustainable use is provided for them. The Trust has been working with other stakeholders to consider the future potential for the site and exploring opportunities for the reuse of these important buildings.

The project remains at an early stage and no specific scheme for the site has yet been developed although the potential for the site to become a hub for the community and a site for tourism and leisure uses is being considered. The need for improved connectivity with the town, including a new pedestrian bridge crossing of the canal, has also been raised in recent consultations and is seen as key to bringing forward a successful scheme for this area. In addition, the Trust is likely to continue to require an operational yard at Ellesmere and is examining how this requirement can also be met. Whilst consideration of these matters is ongoing, the site clearly provides the opportunity to secure significant benefits to the town and its community.

The site in question is currently outside the development boundary of the town and whilst representations have in the past been made to the SAMDev concerning the potential allocation of the site, this has not happened. It is likely that the reuse of these buildings may already be considered appropriate in the context of other more general policies in the emerging plan and that, as such, a specific site allocation is not thought to be necessary or appropriate. We believe however that the inclusion of a more general reference to aspirations for the reuse and regeneration of this area and its improved connectivity with the town in the Development Strategy for Ellesmere would be both appropriate and beneficial. It would provide greater clarity in respect of future aspirations for the regeneration of this important area and enable it to be considered in the context of wider development proposals in the area including future connectivity.

The inclusion of a new sentence referring to aspirations to secure the long term sustainable reuse of Ellesmere Yard and its improved connectivity to the town is therefore requested.

(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)?

Office Use Only	Part A Reference:	
	Part B Reference:	

	note that while this will n(s), you may be asked				
П		articipate in hearing se			,
V		ate in hearing session(s	>)		
07.14	(Please tick one box)	inaka in kha baasia	!(-	<b>\</b> !	
_	you wish to partic onsider this to be n		g session(s	s), piease	e outline wny
		(Plane)	tim		-ht :6
those v	e <b>note:</b> The Inspector who have indicated that firm your wish to partication.	vill determine the most t they wish to participat	appropriate p te in hearing	orocedure session(s).	You may be asked
Signati	ıre:			Date:	25/02/2021
	<b>L</b>			ļ	

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)**.

Day	rt R	Repres	entati	٥n					
rai	i L Di	Kehies							1
Na	ame an	d Organisatio		e Fifer, Planr & River Trus		ager			
Q1.	To wh	ich docume	ent does t	this repres	entatio	n rela	te?		
$\checkmark$	Regul	ation 19: Pre	-Submissio	n Draft of the	e Shropsl	nire Loc	al Plan		
	Susta Local	inability Appr Plan	aisal of the	Regulation 1	l9: Pre-S	ubmiss	ion Draft of	the Sh	ropshire
	Shrop	ats Regulation shire Local Pl se tick one bo	an	ent of the Re	egulation	19: Pre	e-Submissio	n Draft	of the
Q2.	To wh	ich part of	the docu	ment does	this re	preser	ntation re	late?	
Parag	graph:	5.155	Policy:	S11.1	Site:		F	Policies Map:	
_	_	u consider e Local Plai		lation 19:	Pre-Sul	omissi	on Draft o	of the	
Α.	Legally	compliant			Yes:	$\checkmark$	No:		
В.	Sound				Yes:	$\checkmark$	No:		
	•	ant with the l	•	operate	Yes:	$\checkmark$	No:		
Q4. Draffails If you of the	Please t of the to con wish to Shrops	e give detaine Shropshi mply with the support the shire Local Pla	ils of why ire Local I the duty t	Plan is not to co-opera ance or sound	legally ate. Pleadness of t	comp ase be the Regu	liant or is as precisulation 19: P	unso se as p re-Subr	oossible. mission Draft
set ou	ut your	comments.							
Mino	or chan	ges to the wo	rding of pa	ragraph 5.15	55 are so	ught to	improve ac	curacy.	

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.

We note the aspiration for a new marina in Market Drayton and, that whilst a potential opportunity for such a use has been recognised, there is no site specifically allocated for a marina. There is reference to the Canal & River Trust not supporting the allocation of marina developments in local plans. We believe it would helpful to explain the reason for this and this is set out below.

The allocation of specific sites for marina development raises significant concerns for the Canal & River Trust (the Trust) as outlined below. The Trusts preference is for marina proposals to be dealt with by means of appropriate criteria based policy(s) or, where necessary, identified as a potential use within a more general site allocation, for example for leisure/tourism use.

Whilst a marina development may satisfy many land-use planning considerations, in order to physically connect to the Trusts canal network it would also have to successfully pass through the Trust's application process and secure a connection agreement. The acceptability or otherwise of a marina to connect to our waterways is based primarily on consideration of the availability of water resources, navigational safety considerations and any potential impacts on SSSIs.

For each new applicant in the Trust's process, the assessment of water resources takes account of other applications in the process and their cumulative impact at that time. Over time schemes may be added to and withdrawn or removed from the process. Removal can be either voluntarily by the applicant or by the Trust where there is a lack of progress in delivering a scheme as water resources cannot be reserved indefinitely. The addition of new schemes to the process as well as changing environmental factors, water storage, and new or changes to existing commercial abstractions (such as from farming, utilities companies and other industries) can all impact on the availability of water resources over time.

It is therefore possible that whilst a site may be considered deliverable in respect of water resources at the time that a Local Plan is prepared (if it has been through the necessary process) the Trust cannot guarantee that water resources will remain available to a particular scheme during the life of that plan. The Council could therefore be left with an allocated site incapable of being delivered. The NPPF emphasises the importance of ensuring that Plans are deliverable, and consequently a key consideration in allocating any site for development is establishing its deliverability for the purposes envisaged.

For these reasons, the proposed consideration of any marina proposal by means of criteria based policies (such as DP10) in preference to any specific marina allocation is considered to be appropriate.

We would also ask that the following minor amendments are made to paragraph 5.155

- Reference to the "Canals and Rivers Trust" (and any other similar reference in the plan) should be corrected to "Canal & River Trust".
- In terms of reference to the principle of whether such a development is capable of being delivered in para 5.155 we would ask that this is amended to indicate that it "MAY" be capable of delivering such a use

Office Use Only	Part A Reference:
	Part B Reference:

(Please continue on a separate sheet if necessary)
<b>Please note:</b> 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 would be happy to participate in a hearing session if it is considered that this would be of assistance.
(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: Date: 25/02/2021

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)**.

Dart D. Danress	ntation		
Part B: Represe	ntation		,
Name and Organisation:	Debbie Fifer, Planni Canal & River Trust	ng Manager	
Q1. To which documen	t does this represe	entation relate?	
Regulation 19: Pre-Su	ubmission Draft of the	Shropshire Local Pl	lan
Sustainability Apprais Local Plan	sal of the Regulation 19	9: Pre-Submission I	Draft of the Shropshire
Habitats Regulations . Shropshire Local Plan (Please tick one box)		ulation 19: Pre-Su	bmission Draft of the
Q2. To which part of th	e document does	this representat	ion relate?
Paragraph:	Policy: S11.1	Site: MDR012	Policies Map:
Q3. Do you consider th Shropshire Local Plan i	_	re-Submission	Draft of the
A. Legally compliant		Yes: 🗹	No:
B. Sound		Yes: 🗹	No:
C. Compliant with the Dur (Please tick as appropriat	•	Yes: 🗸	No:
Q4. Please give details Draft of the Shropshire fails to comply with the	Local Plan is not l	egally complian	nt or is unsound or
If you wish to support the leg of the Shropshire Local Plan of set out your comments.			
Minor changes to the devel clarity in respect of the con effectiveness of this elemen	nsideration to be given		

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.

### Land to the east of Maer Lane and north of the A53, Market Drayton (MDR012)

There is reference in the second paragraph to pedestrian and cycle links being enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability. Reference to the "proposed marina" is misleading as no site for a marina is currently proposed to be allocated in the Local Plan. We would therefore suggest that this sentence is amended (as detailed below) to refer instead to links to the canal. This could, in any event, also help to facilitate access to any potential future marina.

We would also suggest that the wording of this sentence is amended to include reference to enhancement of pedestrian and cycle links adjacent to the site, such as the canal towpath which borders the site. Development in proximity to canals can lead to increased use of the towpath necessitating changes or improvements to existing surfaces and access points to ensure the path is suitable to accommodate the change in use.

The following wording is suggested to address these comments:

"Pedestrian and cycle links will be enhanced or provided through <u>and adjacent to</u> the site and linking into the town <u>and canal towpath</u> to the proposed marina in order to improve the site's sustainability

There is reference in the fourth paragraph to the site design and layout reflecting and respecting the sites heritage and heritage assets in the wider area. Whilst this would likely include the adjoining canal corridor, we would ask that the guidelines are extended to include specific reference to any future development positively addressing the adjoining canal and the opportunities it presents. We would also wish to see reference to the proposed development having no adverse impact on the structural integrity of the canal corridor or detrimental impact on the heritage, ecology or character of the waterway corridor included within the development guidelines. This could be addressed by inclusion of the following wording:

"Site design and layout will positively address the adjoining canal corridor and ensure no adverse impact on its character, heritage, ecology or structural integrity.

Paragraph 5 refers to the planting of large trees. This may not be appropriate adjacent to the canal given their potential impact on canal infrastructure. The following alternative wording is suggested:

"The provision of an appropriately designed landscaping scheme incorporating native species and, where appropriate, the sustainable planting of large trees within the green infrastructure and public open space will contribute towards......"

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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: Pr	e-
Submission Draft of the Shropshire Local Plan, do you consider it necessary	to
participate in examination hearing session(s)?	

	ission Draft of the Shropshire Local Plan, do ipate in examination hearing session(s)?	you conside	r it necessary to
	note that while this will provide an initial indication of o(s), you may be asked at a later point to confirm you		
$\overline{\mathbf{V}}$	No, I do not wish to participate in hearing session(s)		
	Yes, I wish to participate in hearing session(s)		
	(Please tick one box)		
_	you wish to participate in the hearing sessi onsider this to be necessary:	on(s), please	e outline why
	ould be happy to participate in a hearing session d be of assistance.	n if it is consid	ered that this
those v	note: The Inspector will determine the most approprion who have indicated that they wish to participate in healirm your wish to participate when the Inspector has in	riate procedure pring session(s).	You may be asked
Signatı	ıre:	Date:	25/02/2021

Office Use Only	Part A Reference:
Office Use Only	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)**.

ng ene	cuve represe	intations.						
rt B:	Repres	entati	on					
ame an	d Organisatio				ger			
To wh	ich docum	ent does	this repres	entatio	n relate?			
Regul	ation 19: Pre	-Submissio	n Draft of the	e Shropsh	ire Local Pla	n		
		aisal of the	Regulation 1	19: Pre-S	ubmission D	raft of	the Shr	opshire
Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)								
To wh	ich part of	the docu	ment does	this rep	oresentati	on rel	ate?	
graph:		Policy:	S11.1	Site:	MDR034	P	olicies Map:	
_		_	lation 19:	Pre-Sub	mission D	raft o	f the	
Legally	compliant			Yes:	$\overline{\checkmark}$	No:		
Sound				Yes:	$\checkmark$	No:		
•		•	operate	Yes:	$\checkmark$	No:		
t of the	ne Shropshi mply with t	ire Local ithe duty t	Plan is not to co-opera	legally ate. Plea	compliant ase be as p	or is	unsou e as p	ınd or ossible.
Shrops	shire Local Pla							
ty in re	spect of the	considerati	on to be give					
	rt B: ame an To wh Regul Susta Local Habits Shrop (Plea To wh graph: Do yo pshir Legally Sound Complia Complia Please ti Please tof th to co wish to shrops at your or chan ty in re	rt B: Represement and Organisation  To which docume Regulation 19: Presequence Sustainability Apprediction Shropshire Local Plan Habitats Regulation Shropshire Local Plan (Please tick one begraph:  Do you consider opshire Local Plan Legally compliant Sound  Compliant with the lease tick as approprint of the Shropshire Local Plan to support the extrapolation of the Shropshire Local Plan to support the extrapolation of the Shropshire Local Plan to comply with the extrapolation of the shropshire Local Plan to comply with the extrapolation of the shropshire Local Plan to comply with the extrapolation of the shropshire Local Plan to comply with the extrapolation of the shropshir	Regulation 19: Pre-Submission Sustainability Appraisal of the Local Plan Habitats Regulations Assessm Shropshire Local Plan (Please tick one box) To which part of the document (Please tick one box) To which part of the document (Please tick one box)  To which part of the document (Please tick one box)  To which part of the document (Please tick one box)  To which part of the document (Please tick one box)  Policy:  Do you consider the Regulation is: Legally compliant  Sound  Compliant with the Duty to Collease tick as appropriate).  Please give details of why it of the Shropshire Local It to comply with the duty to the shropshire Local Plan or its compute the legal compliant (Please to the development of the consideration)  To which documents to the development of the consideration of the conside	To which document does this representation  Regulation 19: Pre-Submission Draft of the Sustainability Appraisal of the Regulation 1 Local Plan  Habitats Regulations Assessment of the Reschropshire Local Plan  (Please tick one box)  To which part of the document does graph:  Policy: S11.1  Do you consider the Regulation 19: Deshire Local Plan is:  Legally compliant  Sound  Compliant with the Duty to Co-operate lease tick as appropriate).  Please give details of why you consist of the Shropshire Local Plan is not to comply with the duty to co-operate shropshire Local Plan or its compliance with its strong shrips and the surpost of the development guidelines near the surpost of the surpost of the development guidelines near the surpost of the surpost of the development guidelines near the surpost of the surpost	The Representation  The B: Representation  The Canal & River Trust  The Canal & R	To which document does this representation  Sustainability Appraisal of the Regulation 19: Pre-Submission D Local Plan  Habitats Regulations Assessment of the Regulation 19: Pre-Submission D Pr	Debbie Fifer, Planning Manager Canal & River Trust  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 Local Plan  Habitats Regulations Assessment of the Regulation 19: Pre-Submission Shropshire Local Plan  (Please tick one box)  To which part of the document does this representation related by the presentation of the Regulation 19: Pre-Submission Draft of Signaph:  Policy: S11.1 Site: MDR034  Po you consider the Regulation 19: Pre-Submission Draft of Signaph: No: No: No: No: No: No: No: No: No: No	Debbie Fifer, Planning Manager Canal & River Trust  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 Shr Local Plan  Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of Shropshire Local Plan  (Please tick one box)  To which part of the document does this representation relate?  Graph:  Policy: S11.1  Site: MDR034  Policies Map:  Do you consider the Regulation 19: Pre-Submission Draft of the Opshire Local Plan is:  Legally compliant  Yes: No:  Compliant with the Duty to Co-operate  Please give details of why you consider the Regulation 19: Pre-Sit of the Shropshire Local Plan is not legally compliant or is unsout to comply with the duty to co-operate. Please be as precise as president of the Shropshire Local Plan is not legally compliant or is unsout to comply with 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 us at your comments.

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.

### Land to the west of Maer Lane and north of the A53, Market Drayton (MDR012)

There is reference in the second paragraph to pedestrian and cycle links being enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability. Reference to the "proposed marina" is misleading as no site for a marina is currently proposed to be allocated in the Local Plan. We would therefore suggest that this sentence is amended (as detailed below) to refer instead to links to the canal. This could, in any event, also help to facilitate access to any potential future marina.

We would also suggest that the wording of this sentence is amended to include reference to enhancement of pedestrian and cycle links adjacent to the site, such as the canal towpath which borders the site. Development in proximity to canals can lead to increased use of the towpath necessitating changes or improvements to existing surfaces and access points to ensure the path is suitable to accommodate the change in use.

The following wording is suggested to address these comments:

"Pedestrian and cycle links will be enhanced or provided through <u>and adjacent to</u> the site and linking into the town <u>and canal towpath</u> to the proposed marina in order to improve the site's sustainability

There is reference in the fourth paragraph to the site design and layout reflecting and respecting the sites heritage and heritage assets in the wider area. Whilst this would likely include the adjoining canal corridor, we would ask that the guidelines are extended to include specific reference to any future development positively addressing the adjoining canal and the opportunities it presents. We would also wish to see reference to the proposed development having no adverse impact on the structural integrity of the canal corridor or detrimental impact on the heritage, ecology or character of the waterway corridor included within the development guidelines. This could be addressed by inclusion of the following wording:

"Site design and layout will positively address the adjoining canal corridor and ensure no adverse impact on its character, heritage, ecology or structural integrity.

Paragraph 5 refers to the planting of large trees. This may not be appropriate adjacent to the canal given their potential impact on canal infrastructure. The following alternative wording is suggested:

"The provision of an appropriately designed landscaping scheme incorporating native species and, where appropriate, the sustainable planting of large trees within the green infrastructure and public open space will contribute towards......"

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
Office Use Only	Part B Reference:

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-

	cipate in examination hearing session(s)?	you conside	er it necessary t	Ü
	note that while this will provide an initial indication of n(s), you may be asked at a later point to confirm you		,	g
$\checkmark$	No, I do not wish to participate in hearing session(s)			
	Yes, I wish to participate in hearing session(s)			
	(Please tick one box)			
_	fyou wish to participate in the hearing sessi onsider this to be necessary:	on(s), please	e outline why	
you c	onsider this to be necessary.			
We w	ould be happy to participate in a hearing session d be of assistance.	n if it is consid	lered that this	
We would	ould be happy to participate in a hearing session d be of assistance.	e on a separate iate procedure ring session(s).	sheet if necessary to adopt to hear . You may be aske	ď

Office Use Only	Part A Reference:	
Office Use Only	Part B Reference:	