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SUBMITTED VIA EMAIL ONLY

29135/A3/SJ/JB/bc

23rd February 2021

Dear Sir/Madam,

SHROPSHIRE LOCAL PLAN REVIEW- REGULATION 19 PRE-SUBMISSION DRAFT CONSULTATION LAND AT LONGSLOW FARM, MARKET DRAYTON

Thank you for inviting comments on the Regulation 19 Pre-Submission Draft Shropshire Local Plan ('draft SLP'). We respond on behalf of Yareal Llandforda Limited (our Client) who are promoting land to the north of Market Drayton at Longslow Farm (the 'site') for residential development (see site location appended to this letter). We have previously submitted representations to the 'Strategic Sites Consultation' (2019), 'Preferred Sites Consultation (2019) and the Regulation 18 Pre-Submission Draft Shropshire Local Plan (2020) in relation to the Local Plan Review process. It is submitted that our Client's site is suitable for meeting the housing needs of Market Drayton and the wider County in the Plan period and should be identified as a residential allocation in the Shropshire Local Plan.

It is noted that the current Development Plan in Shropshire consists of the Core Strategy (2011) and the Site Allocations and Management of Development (SAMDev) Plan (2015) which provide a framework for managing development in the County up to 2026. Upon adoption, the policies of the Shropshire Local Plan 2016 to 2038 will replace the policies of the Core Strategy and SAMDev Plan, except for the SAMDev site allocations that are yet to be delivered, which will be 'saved' and therefore continue to form part of the Development Plan.

The National Planning Policy Framework (NPPF) sets out the key framework for plan-making including the 'tests of soundness' for Local Plans (Paragraph 35). The National Planning Practice Guidance (NPPG) provides further advice on plan making and how these tests can be met. It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recent 'Planning for the Future' White Paper (August 2020) consultation.

Shropshire Council intends to submit the draft SLP for examination in April 2021 and anticipates adoption in May 2022, subject to independent examination. It is therefore expected that the current NPPF and tests of soundness will still be applicable based upon this timetable. Our comments are therefore submitted with the current national policy framework considerations in mind. We respond

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in chronological order to specific elements of the draft SLP and provide a series of suggested changes as relevant.

Draft SLP Policy and Supporting Text Specific Comments

Introduction

Whilst we are supportive of the Council seeking to address cross-boundary issues including the accommodating of unmet needs, we consider that the current approach is unsound as it is not fully positively prepared or consistent with national planning policy.

The Introduction provides an overview of the characteristics of Shropshire, the Local Plan framework and identifies some of the strategic cross boundary matters to be considered. There is no reference to the advent of High Speed 2 (HS2) and opportunities it will create for northern Shropshire towns, including Market Drayton, despite the objectives within the Council's Economic Growth Strategy for Shropshire (2017-2021) and at paragraph 3.28 of the draft SLP, which highlights the opportunities around HS2, Market Drayton and the A41 corridor. We consider more recognition should be given to the positive knock-on effects of HS2. Paragraph 102(b) of the NPPF supports the need to consider the opportunities arising from new transport infrastructure:

> *"opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated".*

Under 'Cross Boundary Issues and the Duty to Cooperate' it is stated that in Shropshire's case the County is adjoined by several Local Authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. Strategic planning matters need to be positively addressed with these authorities to meet the legal and soundness test of the Duty to Cooperate. At paragraph 2.27 the draft SLP identifies that '*positive conversations with relevant bodies have been ongoing over the course of the preparation of the Plan, and ahead of the submission of the Plan for Examination a full set of Statements of Common Ground will be made available'*.

In specific relation to housing issues, it is noted at paragraph 3.7 that 1,500 dwellings of the draft SLP housing requirement will go towards meeting the shortfall in housing supply within the Black Country. In relation to employment issues, at paragraph 3.8 the draft SLP now provides 30 hectares of employment land to help meet the needs of the Black Country, out of the total 300 hectares requirement for Shropshire. The positive approach of Shropshire to helping meet wider housing and employment market area needs is supported. Nevertheless, no further explanation appears to be provided within the draft SLP or supporting evidence base as to how these figures have been derived at this stage (including within the published 'Correspondence with the Association of the Black Country Authorities').

The Council has not published a separate Duty to Cooperate Statement or any Statements of Common Ground to address strategic policy matters as required by the NPPF (paragraph 27) at this stage. The PPG 'Maintaining Effective Cooperation' section provides guidance on the format of these statements and states these should be maintained throughout the plan production process and made available on their website by the time the Council publish their draft Plan, *'in order to provide communities and other stakeholders with a transparent picture of how they have collaborated'* (Paragraph 020 ID: 61-020-20190315). Given that there are no accompanying Statements of Common Ground it is difficult for other stakeholders to ascertain the extent of agreement with other local authorities on strategic issues and assess the appropriateness of any agreements reached e.g. in relation to the Black Country shortfall contributions. Further information

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should be provided, and the figures should be kept under review in light of any further evidence from the Black Country Authorities, including progress on the Black Country Local Plan.

For instance, in relation to housing it is noted that the recent update to the standard methodology for calculating local housing needs increases the requirement for Wolverhampton City Council from 750 dwellings per annum under the previous standard method to 1,013 dwellings (as one of the 20 urban areas subject to the 35% uplift under the revised methodology.) Furthermore, the 35% urban lift has also been applied to Birmingham City Council local housing needs. As the Black Country is part of the Greater Birmingham Housing Market Area, this is likely to result in further pressures upon the housing (and potentially employment) land supply within the Black Country and wider housing market area to which it is related. These updates to the standard methodology may therefore have implications for the level of shortfalls due to be accommodated by the draft SLP. However, the implications are difficult to assess without further detail on how the current contribution figures have been derived.

Recommended changes to Introduction

In order for the draft SLP to be positively prepared and consistent with national planning policy we suggest the following changes are necessary:

- The Introduction to the draft SLP should include reference to HS2 and the opportunities it presents for Shropshire, particularly the northern areas of the County and settlements such as Market Drayton (as per paragraph 3.28 of the draft SLP).
- The Council should update and publish a Duty to Cooperate Statement and accompanying Statements of Common Ground to demonstrate the extent of agreement on strategic matters and provide information on how agreements on these matters have been reached, including the further detail on how the contribution towards Black Country unmet need have been derived.
- The housing needs shortfall contribution towards the Black Country in particular should be kept under review and considered in light of the most recent updates to the standard methodology for local housing needs which increases the minimum housing requirement for Wolverhampton City Council and therefore the Black Country local plan area overall. This should be reflected in the Statements of Common Ground required to support the draft SLP. The draft SLP should consider the addition of a mechanism within policy to commit to a review of the housing requirements in light of further unmet needs arising in the future.

<u>Draft Policy SP2 (Strategic Approach)</u>

Whilst we are supportive of the principles of the strategic approach, we object to the level and apportionment of growth currently identified. We consider that a greater proportion of housing growth should be directed to the urban areas/locations and that additional housing land supply in particular should be identified. The current approach is unsound as it is not fully positively prepared, justified, effective or consistent with national planning policy. We are supportive of the identification of Market Drayton as a Principal Centre and Longslow as a Community Hub.

Strategic Approach and Housing Requirements

Draft Policy SP2 (Strategic Approach) identifies that over the plan period from 2016-2038 around 30,800 new dwellings and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and 15 hectares of employment land per annum. The plan will deliver around 7,700 affordable dwellings (equating to around 25% of the total housing requirement). To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas/locations identified in Schedule

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SP2.1, wherein Shrewsbury is identified as the only Strategic Centre and Market Drayton is identified as one of five Principal Centres. Specifically,

> *'Principal and Key Centres will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.'*

Development in the urban areas will be complemented by appropriate new development within 'Community Hubs', identified in Schedule SP2.2, which are considered significant rural service centres and to a lesser extent 'Community Clusters', identified in Schedule SP2.3. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs. In terms of Longslow, we support the retention of this being retained as a Community Cluster given the need to deliver proportionate development to support rural vitality and its proximity to Market Drayton.

Based upon the residential guideline figures provided within Appendix 5 of the draft SLP (and the supply from the wider rural area at note A5.5) around 31,112 dwellings are identified within the housing supply (with 30,912 dwellings to come forward during the plan period taking account of anticipated delivery at Clive Barracks). Analysis of these figures highlights that around 74% of the draft SLP housing requirement is directed to the urban areas/locations (including the centres and strategic sites) and that around 26% is directed to the community hubs, clusters and wider rural area.

We support the urban focused strategy set out in Draft Policy SP2 and the identification of Market Drayton as a Principal Centre. The draft SLP should consider the potential for further development to be directed to the urban locations (under the Strategic, Principal and Key Centres) specified in Schedule SP2.1, including Market Drayton, with a lesser proportion being directed to the more rural settlements in Schedules SP2.2 and SP2.3. There are a number of smaller Community Hubs which have significant development directed towards them. Examples include Burford, which is expected to grow by 190 dwellings, of which 140 are new allocations and 46 are windfalls (a 37% increase in terms of overall dwellings in the settlement, according to the 2020 Hierarchy of Settlements Assessment); Gobowen, which is allocated 360 dwellings over the Plan period – this represents an approximate 29% increase in growth of housing (albeit the majority of this is via SAMDev commitments); Llanymynech (125 dwellings of which 50 are new allocations; totalling a 55% increase); and Hadnall (125 dwellings of which 40 are new; totalling a 56% increase). We support development in the Community Hubs, and it is necessary to support their long-term sustainability, however the scale of development must be proportionate to the size and sustainability of the settlement. The approach needs to be more robustly justified, with reference to the scale of each settlement and its level of services and facilities as well as accessibility to higher order settlements. The spatial strategy should not be reliant on overdevelopment of Community Hubs, but should instead focus on proportionate and sustainable growth alongside directing more growth to the higher order settlements such as Market Drayton.

By directing more growth to the higher order settlements there is the opportunity for the housing land supply to be less reliant upon smaller scale schemes as typically delivered within the lower order settlements. Whilst the NPPF (paragraph 68) recognises the importance of small-medium scale sites to housing delivery and requires Local Plans to identify at least 10% of their supply via sites under 1 hectare, the Council should be cautious in any over-reliance upon smaller scale schemes in particular given there generally higher rate of non-implementation (see further comments below).

Paragraph 3.28 of the draft SLP already outlines how the strategic spatial approach responds directly to the Economic Growth Strategy for Shropshire (2017-2021), reflecting the objective to prioritise investment in strategic locations and growth zones along strategic corridors, which includes the

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corridor of 'North East Shropshire and the A41' covering Whitchurch and Market Drayton, and also supporting opportunities connected to the delivery of HS2 in the second half of the Plan period. Further growth (housing and employment) focused on these urban locations and centres would therefore serve to boost the economic growth of the County in line with the NPPF (paragraph 80) which states *'significant weight should be placed on the need to support economic growth and productivity'*.

The Sustainability Appraisal (SA) for the draft SLP outlines the range of positive benefits for an urban focused strategy, particularly in comparison to other strategy options which would involve greater growth in the rural areas. The SA (page 76) notes that the selected urban focused strategy

> *'is likely to have significant benefits for the following sustainability objectives: protecting and enhancing the range of plants and animals and the quality and extent of wildlife habitats in Shropshire; encouraging a strong and sustainable economy; supporting active and healthy communities; protecting and improving soil quality; conserving and enhancing water quality; reducing carbon dioxide emissions and conserving and enhancing landscape character and local distinctiveness.'*

This tested the scenario of around 75% of growth being directed towards the urban locations, which appears to be carried forward within the draft SLP (with around 74% of housing growth directed to urban locations, as detailed above). The SA of the draft SLP Policy SP2 which sets out the strategic approach states it

> '*is significantly positive towards encouraging a strong and sustainable economy, as well as providing a sufficient amount of good quality housing which meets the needs of all sections of society.'*

It identifies positive outcomes in relation to reducing carbon emissions, access to services, encouraging sustainable means of transport, and supporting active and healthy communities. Whilst the assessment notes some potential negative effects in relation to soil quality (not fully established), landscape character and local distinctiveness, efficient use of natural resources and ecological value, this is mostly due to the use of greenfield land and does not take into account mitigation measures.

Whilst it is recognised that there are some potential adverse effects arising from a more urban focused strategy, in light of its overwhelming positive effects, the Council should consider directing a higher proportion of growth to these urban locations (namely the Strategic, Principal and Key Centres) whilst providing specific policy support for smaller scale affordable housing provision within the rural areas. The scenario of a higher level of growth within the urban areas (more than 75%) does not appear to have been tested within the SA to date. It is also noted that as part of the Preferred Spatial Strategy (2017) a slightly higher level of housing growth was tested via the SA and considered justified (1,430 dwellings versus the current draft SLP requirement of 1,400 dwellings). It is not clear why this slightly higher level of growth is no longer to be accommodated (particularly given it was considered justified previously via the SA and Preferred Spatial Strategy approach). In view of the need for further flexibility (see further commentary below) the Council should consider the need for the SA to test scenarios of higher levels of growth.

The draft SLP (paragraphs 3.5-3.7) outlines that Shropshire Council has undertaken an assessment of the Local Housing Need (LHN) using Government's Standard Methodology, which indicates a housing need of some 25,894 dwellings over the plan period from 2016 to 2038, as at April 2020. The Council proposes a housing requirement of around 30,800 dwellings over the plan period to '*meet housing need and support the long-term sustainability of the County'*. The draft SLP also states that this housing requirement (approximately 19% above the minimum LHN figure) provides some flexibility to respond to changes to LHN over the plan period and an opportunity to:

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> *'a. Respond positively to specific sustainable development opportunities;*
> *b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;*
> *c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;*
> *d. Support the diversification our labour force; and*
> *e. Support wider aspirations, including increased economic growth and productivity.'*

It is not clear from the Local Housing Needs Assessment (August 2020) how the uplift has been determined and whether this uplift of 4,906 dwellings has been determined by the housing land supply capacity i.e. the Assessment only provides the 25,894 dwellings figure and does not provide any commentary on the uplift (the draft SLP identifies that 1,500 dwellings are for the unmet needs of the Black Country). Related to this, it is not clear from the Local Housing Needs Assessment and the Economic Development Needs Assessment (updated December 2020) whether the housing requirements and the economic growth ambitions are fully aligned i.e. the Local Housing Need Assessment does not identify how much of the uplift over and above the minimum local housing need figure is required for economic growth. Equally, the Economic Development Needs Assessment (EDNA) tests the employment land requirements associated with the minimum local housing need and draft SLP proposed local housing need (alongside other scenarios, including job forecasts and past growth trends). The scenarios associated with the housing requirements suggest a lower employment land requirement than that within the draft SLP (132-142 hectares versus the 300 hectares identified within the draft SLP - see Table 8.17 of the EDNA). The evidence and draft SLP should therefore be clearer on the extent of alignment between the housing and economic growth requirements. Should there be a need for further housing growth to support the economic growth strategy fully we consider this would be best distributed in accordance with the urban focused strategy with additional growth at the strategic, principal and key centres.

The Strategic Housing Market Assessment (September 2020) refers to the Local Housing Needs Assessment for the analysis of the overall housing requirement and the former provides an assessment of the type of housing needs over the plan period, including affordable housing. At paragraphs 4.152-4.156 it identifies that the level of affordable housing need (some 17,574 dwellings over the plan period, equating to around 799 dwellings per annum) will not be met by the level of overall housing need (based on past trends of 21% of all housing being affordable). It notes the PPG (Paragraph 008 Reference ID: 67-008-20190722) which states that

> *an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes.'*

Whilst the SHMA states that the level of overall housing that would be required to meet affordable housing need is considered undeliverable (and we do not advocate meeting affordable housing needs in full if this is the case) there is an opportunity for the draft SLP to go further in meeting affordable housing needs via additional sustainable housing development as part of the urban focused strategy.

In relation to accommodating unmet needs the draft SLP should also have regard to the need for ongoing flexibility, particularly in terms of the increase in the Black Country housing requirements arising from the 35% urban uplift to the local housing need figure for Wolverhampton City Council (as outlined in our response to the 'Introduction - Cross Boundary and Duty to Cooperate'). The Council should consider the need for additional residential allocations in sustainable urban locations to provide this flexibility to ensure local and unmet housing needs in the current and beyond plan period are met in full (as per NPPF, paragraphs 59-60 and 67). This is particularly relevant as some of the proposed larger scale development site allocation delivery trajectories extend into the long term, and there is some reliance upon 'Safeguarded Land' removed from the Green Belt to meet

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needs beyond the plan period. Our comments in relation to these matters are outlined further under the relevant Policy SP11.

Housing Land Supply

From the figures provided within Appendix 5 of the draft SLP, around 31,112 dwellings are identified within the supply but with only 30,912 dwellings within the plan period taking into account the anticipated delivery from Clive Barracks (based upon the residential guidelines and supply from the wider rural area detailed at note A5.5). Against the 30,800 dwellings requirement set out in draft Policy SP2 there is therefore no flexibility in the housing land supply identified. This risks the draft SLP not being effective in terms of delivering the necessary housing over the plan period, particularly given issues in respect of lapse rates and windfall allowances (see further commentary below).

Recent Local Plan Examinations for the Guildford Local Plan and South Oxfordshire Local Plan have both provided for a greater degree of flexibility in their housing land supply. The Guildford Local Plan identifies the equivalent to a 36% headroom above its own housing requirements, which helps provide for the unmet needs of Woking, providing flexibility for slippage in the housing trajectory and addressing affordability issues. In the recent case of the South Oxfordshire Local Plan Review a headroom equivalent to 27% above the housing requirements was considered appropriate[1]. This provided contingency in the event of larger allocations being delayed in coming forward. The current draft SLP provides for no flexibility against the housing requirement of 30,800 dwellings. Whilst it is recognised that the 19% uplift against the minimum local housing need figure of 25,894 dwellings provides flexibility for some factors such as unmet housing needs and affordability, it is still below the levels of flexibility identified within these two recently examined (and adopted) Local Plans (36% for Guildford and 27% for South Oxfordshire).

Related to this issue of flexibility, it is not clear what lapse (or non-implementation rate) has been assumed in the housing trajectory overall for the plan period. Whilst the Councils' Five Year Supply Statement (2019) states that a 10% lapse rate has been assumed for deliverable sites, the Strategic Housing Land Availability Assessment (2018) does not make any reference to lapse rates. This should be clearly identified and evidenced as per the NPPG (Paragraph 024 ID: 3-024-20190722) which states that an overall risk assessment should be made as to whether sites will come forward as anticipated. There is no up to date justification provided for the 10% lapse rate assumed in the Five Year Supply Statement i.e. local evidence of implementation rates in recent years (reference is made to the SAMDev Plan Inspectors Report from 2015).

The evidence for the windfall rates assumed for each settlement is also unclear. Whilst the Five Year Housing Supply Statement (2019) references the constant supply this has provided to Shropshire overall in recent years (sites of less than 5 dwellings) and the Strategic Housing Land Availability Assessment (SHLAA, 2018) provides a summary of recent rates across Shropshire but there is no apparent evidence of the settlement by settlement analysis that justifies the assumptions within Appendix 5 (in line with the NPPF, paragraph 70 and the PPG Paragraph 023 ID: 3-023-20190722). The degree of reliance upon windfall developments as part of the housing land supply should be reviewed with more detailed analysis in order to be justified (it currently constitutes 2,682 dwellings which represents around 11% of the housing land supply from April 2019 onwards, excluding completions up to that point). We consider more robust housing land supply would be secured via additional allocations rather than a reliance upon windfalls ensuring an effective strategy for housing delivery.

Our comments in relation to the development suitability of sites identified around Market Drayton are detailed further under Policy S11.

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[1] The South Oxfordshire housing requirement totals 23,550 dwellings (consisting of 18,600 homes for South Oxfordshire's own needs and 4,950 homes for Oxford City) and is to provide enough housing land capacity for 29,893 homes

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Recommended changes to Draft Policy SP2 Strategic Approach

In order for the draft SLP to be positively prepared, justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- The draft SLP should direct a higher proportion of new growth (particularly housing) towards the urban areas/locations (namely the Strategic, Principal and Key Centres) reflecting the benefits (as identified in the SA) of an urban focused approach demonstrated to date and providing further benefits to the economic strategy.
- The draft SLP and supporting evidence base should clearly demonstrate the degree of alignment between the high growth economic strategy employment land requirement and the housing requirement.
- As per our comments on the 'Introduction (Cross Boundary Issues and Duty to Cooperate)' further consideration should be given to the need for additional flexibility in the housing requirement and housing land supply to take account of the increased Black Country housing needs under the revised standard methodology.
- Further flexibility should be provided for in the housing land supply, in accordance with the approach taken in recent Local Plan examinations. This additional supply should be directed towards the urban areas/locations in accordance with the urban focused strategy.
- The flexibility of the housing land supply should be reviewed with respect to lapse rates and the windfall allowance assumed. Reliance upon windfalls as part of the housing land supply should be reduced via the securing of additional allocations as part of the urban focused strategy.

<u>Draft Policy SP7 Managing Housing Development</u>

We **support** the monitoring-led approach of this policy which states:

> *'Additional market housing development outside the settlement development boundaries shown on the Policies Map will be strictly controlled in line with Policy SP10 and will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the Settlement Policies.'*

However, as per our response to draft Policy SP2, we consider sufficient housing land supply and flexibility should be identified and prioritised.

<u>Draft Policy SP11 Green Belt and Safeguarded Land and Table SP11.1</u>

We consider that the draft SLP approach under draft Policy SP11 is unsound as it is not justified or consistent with national planning policy.

This draft Policy identifies areas that are to be removed from the Green Belt and it identifies areas of 'safeguarded land' for future development (subject to a further Local Plan Review, in line with the NPPF, paragraph 139).

Given that safeguarded land can only be released for development following a further Local Plan review that proposes the development, the Council should consider the need for further flexibility beyond the plan period via the identification of sites which could come forward in a timelier manner to respond to future market circumstances.

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The NPPF (paragraphs 136-137) requires the Council to fully demonstrate 'exceptional circumstances' exist to justify amendments to the Green Belt. As such the draft SLP is supported by an 'Exceptional Circumstances Statement' (August 2020). This has utilised the Green Belt Assessment (Part 1, 2017) and Green Belt Review (Part 2, 2018) alongside other pieces of evidence to inform its conclusions.

In relation to the proposals for Green Belt amendments (particularly those at Shifnal where over 90ha of safeguarded land are identified for potential housing and employment development) the Exceptional Circumstances Statement provides a summary for each settlement on how the provisions of the NPPF (paragraphs 136-137) are met. This includes an assessment of all other 'reasonable options' to the release of Green Belt land. We query if the release of Green Belt land is fully justified in this context. For instance, in relation to Shifnal the Exceptional Circumstances Statement (paragraphs 8.73-8.81) notes that there are potential alternative non-Green Belt options at other urban locations along the strategic growth corridor, such as Market Drayton, Shrewsbury and Whitchurch which could mean that in the balance a case for exceptional circumstances is not fully justified. It is suggested within the Statement that only Shrewsbury could only reasonably provide for a scale of development to accommodate unmet needs from Shifnal. We do not agree with this. Whilst Shrewsbury may be the most sustainable location for growth, it is not the only sustainable location in the District. The assessment must recognise that other Principal Centres such as Market Drayton have available land that can, alongside Shrewsbury, contribute towards meeting housing needs in non-Green Belt locations.

Recommended changes to Draft Policy SP11 Green Belt and Safeguarded Land

In order for the draft SLP to be justified and consistent with national planning policy we suggest the following changes are necessary:

- The case for exceptional circumstances should be fully justified as per the NPPF. The Council should consider the appropriateness of alternative non-Green Belt housing land supply options for beyond the plan period within the context of its urban focused strategy and taking account of the non-Green Belt land opportunities at other centres, including Market Drayton.

<u>Draft Policy SP12 Shropshire Economic Growth, Draft Policy SP13 Delivering Sustainable Economic Growth and Enterprise and Draft Policy SP14 Strategic Corridors</u>

The urban focused approach to the spatial strategy for economic growth is supported, with the Strategic, Principal and Key Centres being a focus for growth. The aim to provide for a high economic growth strategy via around 300 hectares of employment land over the Plan period is also supported.

Paragraphs 3.117-3.118 and 3.121 refer to the desire for a 'step change' in Shropshire's economic productivity which will be delivered via investment opportunities in the identified strategic corridors as identified in draft Policy SP14. This includes the 'North East Shropshire and the A41 corridor' *'supporting Shropshire's links to the Northern Powerhouse through Cheshire and connected to the delivery of HS2 later in the Local Plan period, including opportunities in and around'* various locations, including Market Drayton as a Principal Centre (paragraph 3.142).

Whilst we support the ambitions for economic growth, as per our response to draft Policy SP2 and Policy SP11 the objective to deliver a step change in economic productivity should be maximised by reflecting the opportunities for a greater proportion of growth to the urban locations, including Market Drayton as a Principal Centre, and recognising the potential of non-Green Belt sites to deliver additional housing land supply.

Draft Policy DP1 Residential Mix

Whilst we are supportive of the principle of the policy to address the specific local housing needs of Shropshire, we consider that the policy as drafted is unsound as it is not fully justified, effective or consistent with national planning policy.

This draft Policy sets out a series of requirements from residential development sites of varying scales (and tenure) including required dwelling size, type and tenure mix; meeting nationally described space standards; meeting M4(3) wheelchair user dwellings and M4(2) accessible and adaptable dwellings standards; and requiring specialist housing to meet the needs of older people and those with disability or special needs to be provided on site (on sites of 50 dwellings or more). The Council has produced a Strategic Housing Market Assessment (SHMA September, 2020) as part of the evidence for the policies (in accordance with the NPPF, paragraph 61).

The need for these standards to be fully evidenced is set in the NPPF (footnote 46) and the PPG (Housing: Optional Technical Standards section). For example, in relation to the nationally described space standards the PPG (Paragraph 020 Reference ID: 56-020-20150327) identifies that the evidence should consist of need (including what is currently being built in the area), viability and timing. In relation to accessibility optional technical standards the PPG (Paragraph 005 Reference ID: 56-005-20150327 to Paragraph 011 Reference ID: 56-011-20150327) sets out the necessary evidence to justify policies incorporating the standards, including detailed information on the accessibility and adaptability of the existing stock and the size, location, type and quality of dwellings needed.

Whilst the supporting text to draft Policy DP1 provides some commentary on the justification for the standards and references the SHMA evidence, it is not clear from the analysis within the SHMA if all of the PPG relevant considerations have been fully taken into account in justifying the policy requirements. There does not appear to be any evidence justifying the nationally described space standards.

The policy is also supported by a Viability Assessment (July, 2020) in accordance with the NPPF (paragraph 34) and the PPG 'Viability'. However, it should be noted that this is a primarily a typology-based approach and given the need for the viability assessment to be kept under review there is still a need for site and scheme flexibility which is not reflected in the current policy wording. At Paragraph 8.10 of the Viability Assessment the assessment notes that ***'the housing mixes are not sought rigidly across all sites, rather are used to inform the overall housing mix.'*** In line with the NPPF (paragraph 57) the draft SLP Policy DP1 should provide for this flexibility.

Recommended changes to Draft Policy DP1 Residential Mix

In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- Additional policy wording should be incorporated to provide specific site and scheme flexibility.
- The requirements for optional technical standards should be fully justified by the evidence base having regard to the PPG criteria.

Draft Policy DP2 Self Build and Custom Build Housing

Whilst we are supportive of the principle of the policy to address the specific local housing needs of Shropshire, we consider that the policy as drafted is unsound as it is not fully justified, effective or consistent with national planning policy.

This draft Policy states that all sites of 5 or more dwellings in designated rural areas and 10 or more dwellings elsewhere (or sites of 0.5ha) are encouraged to make 10% of the dwellings available as serviced plots for Self Build and Custom Build Housing. This is based on evidence from the SHMA which calculates around 2,400 applications will be made for inclusion on the Self-Build Register over the Local Plan period which equates to around 9% of the calculated local housing need.

It is queried if reliance on estimated demand via the Self Build Register is an appropriate basis for a percentage-based policy. This is particularly relevant given that the criteria for expressing an interest on the Self Build Register are relatively limited i.e. whilst an individual may express an interest the degree to which it is a realistic ambition cannot be determined. It is considered that the draft Policy should continue to encourage self-build but remove the specified percentage of 10% of plots. It should instead refer to the most up to date Self Build Register for evidence of demand within a locality to inform any need to provide for such plots on specific sites. The PPG (Paragraph 025 Reference ID: 57-025-201760728) sets out a number of ways in which Local Authorities can support self and custom build. Whilst Local Plan policies should be supportive, there is no necessity to include a specific threshold as currently proposed and the draft SLP approach places the burden of delivering self-build upon developers. The draft SLP should therefore consider and make reference to the use of other mechanisms such as site-specific allocations or the use of publicly owned land, rather than relying solely upon a percentage-based policy to be met by developers. Any requirement for self-build needs to be worded carefully to reflect the constraints this may place on viability, as well as the potential for non-delivery (and therefore a requirement for flexibility in this respect to revert to affordable/market housing).

Recommended changes to Draft Policy DP2 Self Build and Custom Build Housing

In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- Remove the specified percentage of 10% and continue to encourage the provision of self build housing where it is appropriate and viable, with reference to the most up to date evidence of need within the Self Build Register. Insert clause allowing the reversion of the self build plots to affordable/market housing.

<u>Draft Policy DP11 Minimising Carbon Emissions</u>

Whilst the principle of addressing climate change via the design of new dwellings is supported, the current policy approach is considered unsound as it is not justified, effective or consistent with national planning policy.

This draft Policy requires developments to address climate change primarily via design measures, including a number of requirements and standards which are 'encouraged.' All proposals of 10 or more dwellings are to achieve a minimum 19% improvement in the energy performance and all proposals of 1 or more dwellings should provide a minimum of 10% of predicted energy needs from on-site renewable and low carbon sources. It is 'strongly encouraged' that all residential proposals (particularly those of 50 dwellings or more) achieve zero net-carbon emissions; maximise on-site district heating and cooling; and maximise opportunities to connect to wider heating and cooling networks. Some flexibility is provided in the case of viability issues resulting the requirement being unachievable, which is supported.

Whilst we support the flexibility provided within the policy related to viability issues and higher standards being 'encouraged', we still have concerns with the implications of the policy requirements. The supporting Viability Study (Findings and Recommendations) notes the challenging picture of viability across Shropshire and identifies the additional costs associated with these requirements which adds to these challenges. This may give rise to the policy requirements being unachievable due to viability and therefore undeliverable. We consider that the policy should align with the

national timetable for the Future Homes Standards to provide consistency with national policy and regulations as well as providing for a more effective approach in terms of viability considerations. In relation to the 10% renewable or low carbon energy requirement, the policy is contradictory to the 'energy efficiency hierarchy' whereby energy efficiency measures are prioritised in the first instance and it will further increase costs.

It is not clear from the supporting text what evidence has informed all of these requirements e.g. local evidence on the availability, feasibility and viability of district heating and cooling systems (as per the NPPF, paragraph 151). There are locational issues associated with some of these technologies which may mean they are not suitable across the County e.g. levels of heat demand.

Recommended changes to Draft Policy DP11 Minimising Carbon Emissions

In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- Remove current percentage requirements in relation to energy performance and renewable/low carbon energy supply and align the policy with emerging national Building Regulation as per the Future Homes Standard.

<u>Draft Policy DP12 The Natural Environment</u>

Point 3 of Policy DP12 is unsound as it is not consistent with national planning policy.

Point 3 of the draft Policy states that all development is to deliver at least a 10% net gain for biodiversity. This 'requirement' goes beyond the NPPF which at paragraphs 170 and 175(d) encourages developers to provide net gains. Whilst the draft Environment Bill has proposed mandating gains of 10% for biodiversity it should be recognised that this remains subject to Parliamentary debate, processes and Royal Assent. It would be more appropriate to require a net gain then allow any future legislation to deliver the specific figure.

Recommended changes to Draft Policy DP12 The Natural Environment

In order for the draft SLP to be consistent with national planning policy we suggest the following changes are necessary:

- Remove reference to the requirement for a 10% net gain and instead make reference to a requirement for net gain in accordance with the most up to date legislative requirements.

<u>Draft Policy S11 Market Drayton Place Plan Area</u>

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

This draft Policy details the specific development requirements and locations for future development within the Market Drayton Place Area. At Policy S11.1 Development Strategy it identifies a number of key policy provisions for the Principal Centre of Market Drayton, including:

- Market Drayton will fulfil its role as a Principal Centre, acting as a focus for strategic growth objectives in the north-east of the County, delivering around 1,200 dwellings and making available around 35ha of employment land. New housing and employment development will

respond to local needs, the needs of the surrounding hinterland, provide opportunities for existing businesses to expand and opportunities associated with HS2.

- New residential and employment development will be delivered through the saved SAMDev residential allocations and the Local Plan site allocations. These will be complemented by appropriate windfall residential development within the Market Drayton development boundary, as shown on the Policies Map where it is consistent with relevant policies of this Local Plan.
- The relocation of Market Drayton Sports facilities to land at Longford Turning, identified on the Policies Map, is a central objective of the Strategy, and housing development (MDR39 and MDR43) has been identified specifically to support its delivery. Should the relocation of the sports facilities to the Longford Turning site prove to be unviable, consideration will be given to alternative sites adjoining the A53 to support the proposed relocation, where this meets the requirements of other relevant policies of the Local Plan, and would offer a viable opportunity to support effective pedestrian and cycling movements with the rest of the town. In this scenario the Council will positively consider the release of further land for residential development outside the defined development boundary where this can be clearly shown to provide cross-subsidy support for the proposed relocation.
- Whilst land is not specifically allocated for this purpose, the opportunity to deliver a marina and related uses on land at Victoria Farm is recognised. Consideration will be given to the need for additional market residential development outside the town's development boundary where this is clear and demonstrably linked to the deliver of the marina. It is noted that the previous references to site allocations MDR012 and MDR034 to contribute to feasibility work for the marina within the Regulation 18 draft SLP (September 2020) have been removed.

Under Schedule S11.1(i) the draft SLP allocations for Market Drayton Principal Centre are identified, alongside the Saved SAMDev allocations (in Appendix 2 of the draft SLP). It is noted that the draft SLP site allocations are those that were included in the Market Drayton Neighbourhood Plan, which was found not to meet the Basic Conditions at Examination (October 2018). In our previous representations to the draft SLP consultations (and the Market Drayton Neighbourhood Plan) we have expressed a number of concerns in relation to these proposed allocations. Our concerns are outlined below and remain relevant in light of the updated draft SLP.

Land at Victoria Farm, Market Drayton (MDR012)

The site is identified for 70 dwellings. The site is adjacent to allocation MDR034, and whilst it doesn't face the same flooding issues (see further commentary below) it does face some environmental issues which could affect its capacity, including ecology and the setting of the Grade II listed Victoria Bridge.

It is noted that the site allocation 'development guidelines' have been amended from the Regulation 18 draft SLP (September 2020) where the aspiration for a new marina development was required to be considered as part of this site (and the site was required to contribute to initial feasibility work). The updated Regulation 19 draft SLP has removed this requirement, with the development now only required to consider new or enhanced pedestrian and cycle links to the proposed marina.

However, the supporting Market Drayton Place Plan Area Sustainability Appraisal (SA) Site Assessments (December 2020) continue to reference the site's ability to contribute to the marina as part of the justification for the site's allocation. Within the Stage 3 assessment 'Strategic Considerations' it states

> *'the scheme would support the delivery of the proposed marina development and is therefore of strategic importance for the town. Development on the site will therefore need to support, through cross subsidy, the delivery of the marina.'*

In the 'Reasoning' commentary it states:

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> *'a key benefit for this site is the ability to require a cross-subsidy contribution to support the proposed marina development… the community benefit and associated weighting in the planning balance against other site options is predicated on the delivery of the marina development.'*

In the 'Allocation Design Requirements' commentary it states:

> *'development will be supported where it comes forward as part of a comprehensive redevelopment through a masterplan in association with a proposal for a marina… '.*

In addition, the draft SLP supporting text at paragraph 5.152 states the opportunity to develop a new marina remains a key objective and

> *'in selecting the residential site allocations, consideration has therefore been given to the impact these would have on the ability to deliver these objectives.'*

As we previously expressed in our representations to the Regulation 18 draft SLP (September 2020) we considered that the uncertain delivery of the marina could not be considered a tangible benefit and as such the site should have been compared objectively against other alternatives. However, whilst the requirement for cross-subsidy has now been removed in the Policy the supporting evidence for justifying the allocation appears to remain based upon on this assumption. It is not therefore clear on what basis this site has been preferred for allocation versus other site options within Market Drayton. Whilst the site scores -6 'Fair' in the Stage 2a SA assessment it is noted that some of the negative scores relate to key environmental constraints including ground source protection zones and heritage assets (as well as landscape value) which may not be as readily mitigated as other assessment factors, such as accessibility. **We therefore object to the allocation of MDR012.**

Land west of Maer Lane and north of the A53, Market Drayton (MDR034)

This site is identified for 120 dwellings. The development guidelines state that the areas of Flood Risk Zones 2/3 will be excluded from the area for development, potentially utilised for green infrastructure provision. The Strategic Flood Risk Assessment Level 2 and the Market Drayton Place Plan Area SA Site Assessment identifies that approximately a third of the site is affected by Flood Zones 2/3. On the basis of a total site area of around 5.6 hectares it is queried if the anticipated level of development can be sufficiently accommodated with this extent of exclusion, particularly in light of other flood risk sources e.g. surface water; known heritage issues (e.g. setting of Grade II Listed Victoria Bridge and the canal); and surrounding noise (boat yard, A53 and commercial development). The SA Site Assessment notes that further flood modelling may be required; this has the potential to impact further on capacity.

Similar to allocation MDR012, the site allocation 'development guidelines' for MDR034 have been amended from the Regulation 18 draft SLP (September 2020) where the aspiration for a new marina development was required to be considered as part of this site (and the site was required to contribute to initial feasibility work). The updated Regulation 19 draft SLP has removed this requirement, with the development now only required to consider new or enhanced pedestrian and cycle links to the proposed marina.

However, the SA Site Assessment Stage 3 notes in its 'Reasoning' for the allocation of site MDR034 that a key benefit is the ability to require a cross-subsidy contribution to support the proposed marina development to the north-east/north of Victoria Wharf, which weighs in favour of this site against other site options. In the 'Allocation Design Requirements' commentary it also refers to the need for the development to come forward in associated with a proposal for a marina. As outlined in relation to site MDR012, it is therefore also unclear on what basis site MDR034 has been preferred when the

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link with the marina proposal is no longer a factor. Whilst the site scores -3 'Fair' in the Stage 2a SA assessment it is noted that some of the negative scores relate to key environmental constraints including flood risk and heritage assets which may not be as readily mitigated as other assessment factors, such as accessibility. **We therefore object to the allocation of MDR034.**

Land at Longford Turning, Market Drayton (MDR039 & MDR043)

These sites are identified for 120 dwellings. At draft Policy S11.1 and paragraphs 5.152-5.154 the draft SLP notes the difficulties encountered with this allocation via the Market Drayton Neighbourhood Plan, which was unsuccessful at examination. The draft SLP recognises the continued uncertainty with regard to the delivery of these residential allocations in relation to the relocation of the Market Drayton Sports Facility and subsequent access arrangements (which is also referenced within the SA Site Assessment Report). Viability is a key consideration for the proposal. The strategy therefore proposes a contingency plan of supporting other sites along the A53 that could support the sports facility relocation. Where a site is being preferred in relation to others in view of the potential to cross-subsidise another development option the case in terms of viability should be clear. These sites score -8 (both Poor), yet they appear to progress on the basis of the ability to deliver a community benefit, without being supported by evidence that this is deliverable. **We therefore object to the allocation of MDR039 and MDR043.**

Alternatives for Market Drayton

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

The SA Site Assessment states that in relation to the site allocations previously proposed via the Neighbourhood Plan and now taken forward via the draft SLP it has sought to address the Examiner's concerns regarding the lack of formal site assessment and comparison of site options, including the deliverability of the marina. Whilst the draft SLP no longer requires sites MDR012 and MRD034 to assist delivery of the marina, our commentary above notes how this then calls into question the justification for their allocation ahead of other site options which can deliver on the objectives for Market Drayton including the relocated sports pitch. Housing could be better directed to our Client's site that will focus on delivering affordable housing and other community benefits, such as the relocated sports pitch. Whilst evidence for the draft SLP produced since the Neighbourhood Plan Examination has informed the SA assessment process, it appears from the draft SLP supporting text (paragraphs 5.152-5.156) and draft Policy S11.1 that the Council has merely sought to provide a 'contingency plan' to the non-delivery of these sites with an additional allocation of site reference MDR006, Land adjoining Adderley Road and potential speculative development outside the settlement boundary of Market Drayton. This is as opposed to a genuine reappraisal of all reasonable site options on their merits in an objective manner without reference to cross subsidising the marina or relocated sports pitch.

The SA Site Assessment identifies almost the whole of our Client's site as site reference MDR049. It is noted in the 'Strategic Considerations' commentary for MDR049 that the SA Site Assessment states the site:

> *'represents a significant growth option for the town, and has the potential to contribute effectively to the delivery of the town's aspirations to relocate the sports facilities.'*

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It is noted in the scoring process that relative to the site allocation MDR039/043, MDR049 is assessed comparably, with the former only scoring higher in relation to the 'Site boundary within 480m of a public transport node with a regular service offered during peak travel times' criteria. Whilst our Clients site scores -10 'Poor' this is primarily related to accessibility considerations, which are more readily mitigated by infrastructure improvements (provision of on-site amenity space and play areas) unlike environmental constraints such as flood risk and impacts upon heritage assets which affect allocations MDR012 and MDR034 in particular. This fact is noted in the commentary for site allocations MDR039 and MRD043 whereby the SA Site Assessment notes that the negative scores are primarily related to accessibility and mitigation measures are to be put in place.

Further to this, as part of the SA Site Assessment process it is noted that sites which do not meet the accessibility criteria (criteria 5 and 6) score 'negative' with those that do scoring 'positive'. This covers a range of facilities such as proximity to primary schools, GPs, play areas and public transport nodes. We would query whether it is reasonable for sites not meeting the accessibility criteria to be similarly scored 'negative' to sites which are in proximity to a significant environment or physical constraint e.g. sites within flood risk areas or in proximity to designated sites and heritage assets. As detailed above in our comments, some of the accessibility factors are likely to be less restrictive to development than significant environmental or physical constraints, and may be more readily mitigated e.g. provision of on-site amenity space and play areas to enhance accessibility. The SA should consider whether those sites not meeting the accessibility criteria (in particular for proximity to amenity space, play areas, and natural greenspace) should instead be scored 'neutral' to better reflect this differentiation.

Whilst it is recognised that the SA scoring does not take into account mitigation, the assessment process could be done in a way to more fully reflect the potential sustainability outcomes of sites based upon draft SLP Policies, namely by considering their size e.g. larger sites which are not in proximity to existing facilities are more likely to provide on-site facilities such as play areas and amenity spaces (as detailed under draft SLP Policy DP15). Such sites (that do not currently meet the accessibility criteria) could score 'neutral' instead of 'negative' against the accessibility criteria.

It is worth noting that the site assessment for MDR049 suggests a capacity of 1,034 dwellings. We have undertaken a more site-specific assessment that takes account of flood risk, landscape sensitivity and potential infrastructure requirements, which suggests an indicative capacity of around 550 dwellings (see our representations dated 8th February 2019). Our Client's site is of the size whereby it could deliver contributions on and off-site to overcome the issues raised, and it can be designed to deliver a landscape-led and sensitive development that respects its context, including the surrounding countryside. It therefore represents a clear reasonable alternative to the site allocations proposed at Market Drayton within the draft SLP at present. It should be identified within the draft SLP strategy for Market Drayton at this stage in order to secure future housing delivery as opposed to a reliance upon the proposed draft SLP allocations (which draft Policy S11 already recognises require contingency planning from the outset due to uncertainties on deliverability) and potential speculative development outside the development boundary.

Other comments on Policy S11

Within the Market Drayton Place Plan Area, a number of Community Hub settlements have been identified (S11.2) via the draft SLP allocations set in Schedule S11.2(i). This totals around 350 dwellings under the residential guidelines, of which 209 dwellings are completed or have planning permission and 139 dwellings (around 40%) remain to be developed, primarily consisting of small-medium scale sites (allocations and windfalls). The Council should consider the potential to provide a more sustainable and secure strategy focused upon the town of Market Drayton, alongside sustainable growth of the Community Hubs and Clusters, as per our comments on draft Policy SP2. The risks to the delivery of smaller scale sites should be factored into the draft SLP housing trajectory

and considered in its approach to the distribution of housing growth within the Market Drayton Place Plan Area e.g. lapse rates, which can generally be higher for smaller scale schemes.

Recommended changes to Draft Policy SP11 Market Drayton Place Plan Area

In order for the draft SLP to be justified and effective we suggest the following changes are necessary:

- We consider that additional housing growth should be directed to the Principal Centre of Market Drayton and that additional allocations are required to ensure delivery of the residential development requirement.
- The site allocations should be reassessed alongside alternatives to ensure all options for growth have been assessed objectively, without any weight given to the marina or relocated sports pitch, unless there is evidence to support their deliverability. The SA should give consideration to the relative scoring of accessibility factors versus significant physical and environmental constraints.
- Our Client's site should be considered as a reasonable alternative site allocation to secure delivery of the housing requirement for Market Drayton and key objectives for the area, which could include the relocated sports facility given the size of the site.

<u>Draft Policy S19 Strategic Settlement: Clive Barracks and Draft Policy S20 Strategic Settlement: Ironbridge Power Station</u>

We consider that the policies are unsound as they are not fully justified or effective.

The Strategic Settlements of Clive Barracks (draft Policy S19) for 750 dwellings and Former Ironbridge Power Station (draft Policy S20) for 1,000 dwellings are identified as a part of the housing delivery strategy. Appendix 7 highlights the anticipated high level delivery trajectory for these sites, with Clive Barracks extending beyond the plan period (delivering only 550 dwellings in the plan period) and the Former Ironbridge Power Station being long term also (up to end of the plan period). There does not appear to be any information within the draft SLP or supporting evidence base on how the trajectory has been derived and no updates provided from the previous Shropshire Council 'Strategic Sites Consultation' (2019) on how the necessary assessment work for these strategic settlements has progressed.

In accordance with the PPG (Paragraph 022 Reference ID: 3-022-20190722) information on a sites' suitability, availability and achievability can be used to assess likely timescales as well as indicative lead-in times and build out rates, with the advice of developers and local agents being important in this regard. As per our comments under draft Policy S16, the Council should clearly set out the detailed anticipated delivery trajectories for these sites and be transparent on the assumptions applied in order to ensure any risk to the delivery of housing at these sites within (and beyond) the plan period is fully taken into account. These assumptions should reflect the site-specific existing characteristics affecting the development of these strategic settlement sites and future requirements (such as their existing/previous use and brownfield status and infrastructure) to enable their effective delivery. If the risk assessment demonstrates that such sites are likely to be longer term and further beyond the plan period than anticipated, the Council should consider the need to identify further flexibility within the housing land supply by directing additional allocations to the urban locations as per the urban focused spatial strategy for development (Policy SP2).

In addition, we have significant concerns around whether the proposed development at Clive Barracks will be sustainable given it is too small to have any degree of self-sufficiency, and its distance from Market Drayton may encourage dependency on the car. Any measures to deliver bus improvements will require significant subsidies early and throughout the development, which need to be considered alongside other requirements to ensure the development is viable and deliverable. In our view, this growth should be directed to available sites north of Market Drayton in the first instance, as this can deliver growth that is not as reliant on journeys by car. Clive Barracks may be better suited to a

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strategic employment allocation given its location adjacent to the A41, which the plan recognises is an important strategic corridor thereby providing greater alignment with Policy SP12.

Recommended changes to Draft Policy SP19 Strategic Settlement: Clive Barracks and Draft Policy SP20 Strategic Settlement: Ironbridge Power Station

In order for the draft SLP to be justified and effective we suggest the following changes are necessary:

- Further detail to be provided to support the housing trajectory identified, taking into account the site-specific risks and constraints to delivery.
- Direct housing growth from Clive Barracks to the more sustainable location of Market Drayton Principal Centre in the first instance to ensure housing growth at more sustainable and deliverable sites which are not reliant upon significant infrastructure upgrades or less sustainable modes of travel.

Summary of Suggested Changes and Conclusion

We have set out a number of recommended changes to the draft SLP related to the strategic approach, settlement and site-specific policies and other development management policies to ensure it complies with the NPPF and its tests of soundness.

Our Client supports the identification of Market Drayton as a Principal Centre and Longslow as a Community Cluster within the settlement hierarchy. Whilst we are supportive of the Council going beyond the minimum local housing needs, the urban focused strategic approach and the desire to deliver a 'step change' in the economic growth of the County, we have a number of concerns that the draft SLP at present will not deliver upon these requirements and ambitions. We consider that the existing approach and evidence justifies the need to consider the provision of additional housing growth, with a greater emphasis upon delivering at the urban locations/areas (namely the Strategic, Principal and Key Centres) as part of the preferred urban focused strategy.

Additional site allocations options along the A53 in Market Drayton should be considered to ensure housing delivery within Market Drayton is sustainable and deliverable. Our Client's site, Land at Longslow Farm provides a clear reasonable alternative site option which could secure housing delivery in Market Drayton as well as potentially supporting objectives for the relocated sports facilities.

We would be grateful for confirmation that these representations have been received and registered as duly made. We trust this submission is clear and helpful, but should you have any questions in relation to the above and/or attached please do not hesitate to contact me.

Yours sincerely,

JAMES BONNER
Associate

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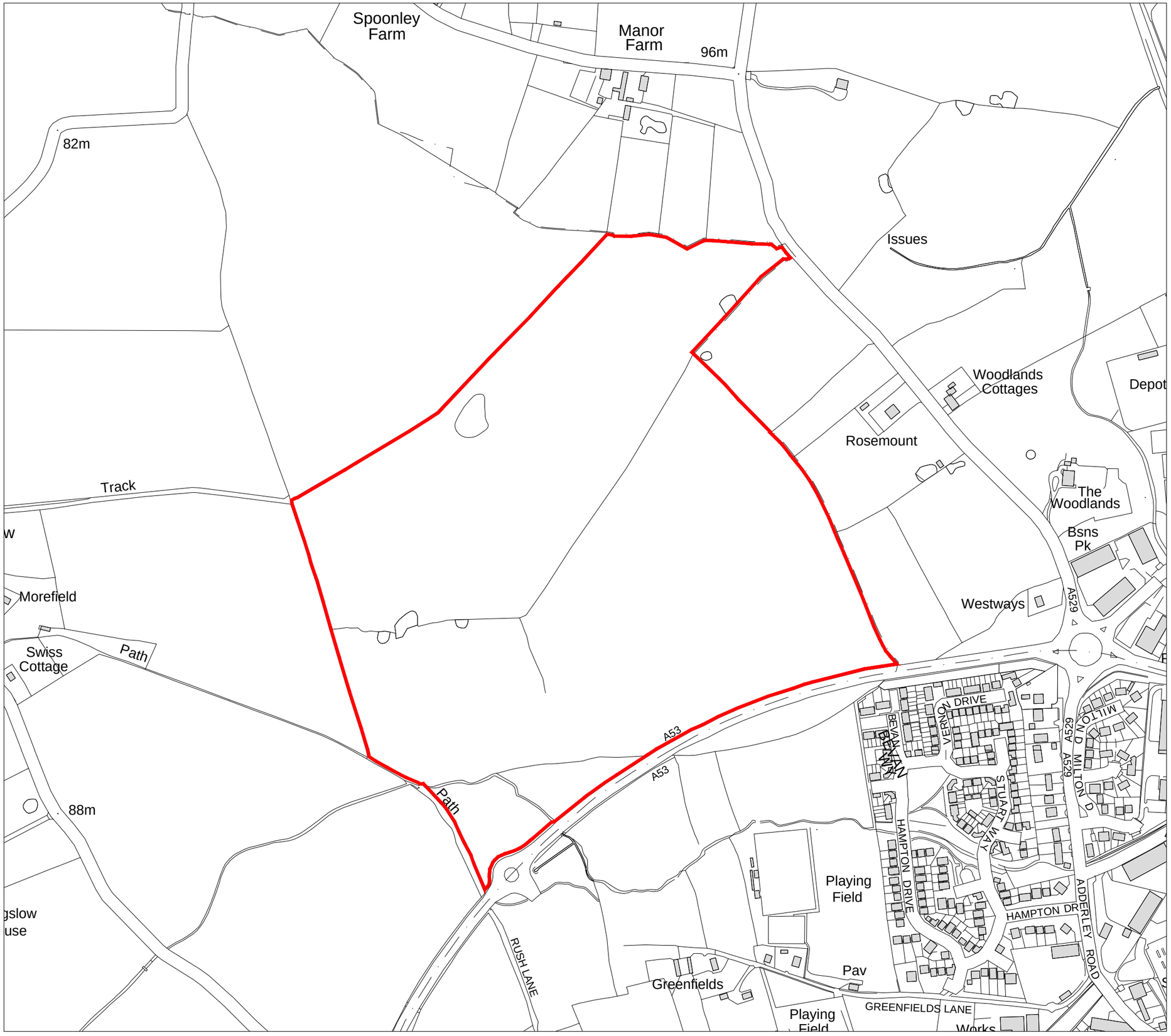
Land North of Market Drayton (36.4 Ha)



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Project
Longslow Farm, Market Drayton

Drawing Title
Red Line Boundary Plan

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