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Shirehall, Abbey Foregate,
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Dear Sirs

Shropshire Local Plan Regulation 19 Pre-Submission Draft Consultation

Introduction

We are instructed by Seabridge Developments Limited (SDL) to submit representations in respect of the Regulation 19 Pre-submission Draft Shropshire Local Plan.

Our client has separate Agreements with various landowners to promote:

a) Land east and west of Maer Lane, Market Drayton (MDR012 and MDR034); and
b) Land south and east of Victoria Farm and north of A53 (SLAA Site MDR046).

These representations relate to S11. Market Drayton Place Plan Area and more specifically, Policy S11.1 Development Strategy: Market Drayton Key Centre and the associated site allocations and explanatory text.

By way of background, it should be noted that SDL supported Market Drayton Town Council in its aborted attempt to promote a Market Drayton Neighbourhood Plan (MDNP) and has since continued to liaise closely with the Town Council to support of its aspirations for a marina, and associated commercial development, capable of creating a vibrant destination development, generating jobs, attracting visitors and generally improving the prosperity of the Town. This aspiration continues to be supported by the Town Council and the local community which it serves.

As the emerging Local Plan (eLP) has progressed, we have also had a constructive dialogue with the Council's planning policy section, through Mr West and we are pleased to note that the concerns we expressed in relation to the Regulation 18 proposals for allocations MDR012 and MDR034 have been accommodated and resolved. That said, should any modifications be promoted by the Council or more likely third parties (seeking to substitute other land in place of either or both of these sites), then my client would expect the right of reply through the Examination process.

Our client also notes that the Council is supportive of a marina with associated and enabling development at Victoria Farm, albeit, the eLP does not make a site specific allocation in this respect because of concerns previously expressed by the Canals and River Trust (CRT) which although currently supportive of our client's initiative, is reluctant to support any site specific allocations that might commit it to that support throughout the Plan period, due to potentially changing operational and technical considerations that might occur over time.

That said, our client is appreciative of the positive wording that will assist and lend support to any future proposals that our client may seek to promote through a planning application at some stage in the future. It is these 'words of comfort' as expressed in Policy S11.1 and the associated text, that allows our client to support the Plan in this respect too. Should any potential modifications to the text associated with a potential future marina at Victoria Farm be promoted by the Council, or third parties, then my client would expect the right of reply through the Examination process.

In the circumstances, these representations can be summarised as follows:

a) Our client offers full support for the proposed housing allocations off Maer Lane (MDR012 and MDR034), which we consider to be suitable, available and deliverable, early in the Plan period.

b) Support is also offered for the wording of Policy S11.1(4) which offers supporting policy context to realise the local community's aspirations for a marina with related uses and enabling development, at Victoria Farm via a planning application, when circumstances allow.

c) Our client expresses surprise and some concern at the proposed housing allocations at Longford Turning (MDR039 and MDR043), which we note are intended to enable the potential relocation of the existing sports and recreation facilities from Greenfields Lane. Given the poor physical, technical and sustainability credentials of this location (as previously assessed in the Council's SLAA) to accommodate the proposed development we are not at all surprised by the amount of objection that they have attracted.

Officers have previously enquired about the potential to relocate the Greenfields Lane facilities, as part of a comprehensive mixed use scheme, including a marina and other associated and enabling development at Victoria Farm (SLAA Site MDR046) but for whatever reason chose to support the proposals at Longford Turning instead.

It is clear from the current wording of Policy S11.1(3) that the Longford Turning proposals may not be sufficiently sustainable, robust, viable and deliverable. In these circumstances, our client wishes to place on record that there remains scope to accommodate the Greenfields Lane facilities, with appropriate enabling residential development as part of a comprehensive and sustainable mixed-use development including a marina etc, adjacent to Victoria Farm, should the current proposals at Longford Turning not find favour, or subsequently flounder.

Our representations are set out more specifically, below.

Policy S11.1.

1. We support the continued role of Market Drayton as a Principal/Key Centre, acting as a focus for strategic growth objectives in the north-east of the County, although **we suggest that the policy should state '<u>at least</u>' instead of 'around' 1,200 dwellings.**

2. We note that new residential development (presumably to meet the strategic housing objective of 1,200 dwellings) will be delivered through the saved SAMDev residential allocations and the Local Plan residential site allocations, complemented by windfall residential development within the Town development boundary and appropriate cross-subsidy and exception (affordable) development. **We also welcome reference to the possibility for additional residential development outside the defined development boundary to enable the delivery of proposals, such as the relocation of existing sports facilities from Greenfields Lane (3) and also the local community's aspiration for the development of a marina at Victoria Farm (4)**.

3. We note that the relocation of Market Drayton Sports facilities from Greenfields Lane is a central objective of the Strategy. That said, we have serious concerns about the suitability and deliverability of the identified land at Longford Turning for the relocation of the existing facilities at Greenfields and the appropriateness of the proposed enabling housing allocations MDR039 and MDR043.

   Our client was previously asked by Officers to consider accommodating at least some if not all of such facilities on its land north of the A53. It was envisaged that land could be provided to the Council for sports and recreation use as part of a mixed use development that would *inter alia,* also deliver a marina and other beneficial proposals.

   Should the Longford Turning proposals subsequently be considered unsuitable/inappropriate and/or unviable or undeliverable, our client remains willing to accommodate the sports and recreational facilities on its land to the east of Victoria Farm, as part of a mixed-use sustainable urban extension to the Town in this location (SLAA site MDR046).

4. Both Market Drayton Town Council and Shropshire Council and the local community in Market Drayton strongly support the principle of a new marina with associated and enabling development at Victoria Farm, but the Canal and Rivers Trust (CRT) has a policy of not endorsing site specific allocations for marinas, because it claims the capacity and capability of the canal network to accommodate such development can change over time. It should be noted, however, that Policy DP10 (5) states *"New marinas should be located within or close to settlements. Applicants should demonstrate the capability of the canal network to accommodate the development"* (emphasis added). We consider that a similar caveat could be included with a site specific allocation at Victoria Farm.

   In seeking to avoid a CRT objection, the LPA proposes 'words of comfort' instead of a site-specific allocation for a marina and related and enabling development at Victoria Farm. Based upon our application and subsequent discussions with the CRT it is evident that the CRT currently has no objection in principle to a marina at Victoria Farm, subject to technical approval. In the light of this supportive feedback from CRT and the Council's continued support, our client is sufficiently encouraged to progress work on preparing a planning application for a marina based development, which can be considered on its merits in the context of positive wording provided at S11.1(4) and paragraph 5.155.

Schedule S11.1(i) Residential Allocations: Market Drayton Principal Centre

We fully support the proposed housing allocations to the east and west of Maer Lane, Market Drayton (MDR012 and MDR034 respectively), but we are compelled to object to proposed site allocations at Longford Turning (MDR039 and MDR043), because we are concerned about the unacceptable harmful impacts the development of these two sites would have. We have previously intimated that the relocation of the Greenfields Lane facilities and associated enabling residential development could readily and more appropriately be accommodated on SLAA Site MDR046, as part of a mixed-use development associated with a marina.

Land to the east (MDR012) and land to the west (MDR034) of Maer Lane, Market Drayton

We have previously pointed out that the Site Assessment for MDR012 incorrectly scores the site as a '-' 'high landscape sensitivity', when in fact the LVSS identifies it as 'medium-low' landscape sensitivity, which no doubt reflects the fact that the land is enclosed by the A53 to the south; the Canal to the north and MDR034; and employment development/allocation to the west. Its score should properly be increased, although we acknowledge that its overall sustainability is likely to remain as 'Fair'.

As a matter of record, MDR0034 is also scored as '-3' and 'Fair' and both MDR012 and MDR034 score better than sites MDR006, MDR039 and MDR043 around the outer edge of the A53 by-pass, the latter of which was rejected in the SLAA 2018.

It is plainly evident that MDR012 and MDR034 represent the most appropriate and sustainable housing development opportunities on the periphery of the Town, because they are within convenient walking distance of the centre and they are effectively enclosed by the Canal to the north-east-and employment (existing and proposed) to the north-west and so development here will be well related to the urban area and seen as within the physical and visual confines of the Town.

Our client therefore offers strong support for the allocation of MDR012 (70 units) and MDR034 (120 units) for housing, since the allocations are supported by evidence and by any objective planning assessment, are perfectly acceptable and indeed, represent the most appropriate opportunities for housing development outside of the current development boundary.

We are, however, confused by reference in the Development Guidelines for both MDR012 and MDR034, which in the second paragraph mention *"the proposed marina"*, even though it is not currently a proposal, but merely an aspiration. **We consider that the second paragraph of the Guidelines for both MDR012 and MDR034 should be modified to read**:

> *"Pedestrian and cycle links will be enhanced or provided through the site and linking into the town and* ***to the existing canal towpath (subject to the approval of the Canal and River Trust)****, in order to improve the site's overall sustainability."* (replacement wording highlighted in bold).

This modification to the Guideline would facilitate linkage to any future proposals that may come forward for a marina on land at Victoria Farm, including any associated improvements to pedestrian connectivity to the north of the Canal and over the A53 to link to the towpath.

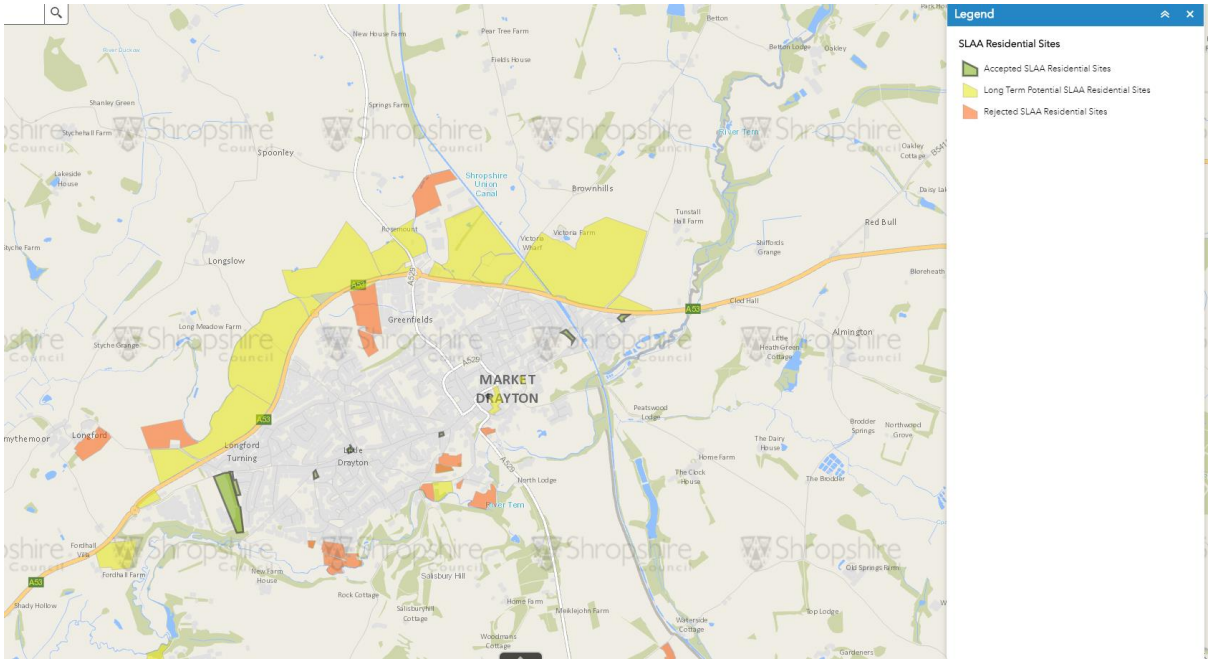
Paragraph 5.156 should reasonably include reference to the proposed housing allocations on land off Maer Lane (MDR012 and MDR034), since these two allocations are capable of being delivered early in the plan period and Seabridge Developments Limited fully intends to bring both sites forward for housing development without delay. **Appendix 7 should also be amended to reflect our Client's stated objective of their early delivery.**

<u>MDR039 and MDR043 Land at Longford Turning, Market Drayton (120 Dwellings)</u>

The relocation of the existing Market Drayton Sports facilities at Greenfields Lane is a central objective of the Strategy, but one that should not be promoted at the cost of unsustainable residential development, particularly where a more suitable site at Victoria Farm is potentially available to accommodate the relocation (MDR046). The Longford Turning allocations, have a number of potentially fatal difficulties and flaws in relation to the provision of safe and convenient pedestrian and cycleway access; unsuitable topography; significant landscape impacts and creation of unsustainable residential development.

The Site Assessments schedule gives both MDR039 and MDR043 an overall score of '-8' and 'Poor' Sustainability and it is further noted that the Residential Conclusion Map (Appendix F of the SLAA Residential Sites 2018) identifies MDR043 as 'rejected' and yet both sites are proposed to be allocated, even though paragraphs 5.153 and 5.154 of the text suggest a lack of confidence in their deliverability and refer to the opportunity for potential alternative locations.

Extract from SLAA 2018 (rejected sites (including MDR043) shaded in orange)



Our client was asked by Officers to consider accommodating a relocation of the Greenfields Lane facilities on its land north of the A53 as part of a mixed use development that would *inter alia,* also deliver a marina and related uses. Our client agreed to this and still stands by this offer, which could in the future, be delivered as part of an appropriate mixed-use development to provide a range of residential, commercial and tourist and leisure development/uses, including a marina, that combined would deliver, with much greater certainty, significant social and economic benefits with less landscape impact.

Sustainability Appraisal (SA)

We note at Table 10.4 – Mitigation Measures for Site Allocations (page 200) that MDR039 and MDR043 (Longford Turning) are acknowledged to be not within walking distance of key services and facilities, which is a factor that coupled with <u>high landscape impact</u>, results in these sites being classed as 'Poor' in the SA. It is difficult to understand why the Council persists with these unsound allocations, given that they are inferior to the land at Victoria Farm (MDR046), which can also accommodate other aspirational development such as a marina.

It is further acknowledged that: *"The delivery of this proposal is subject to it supporting the proposed relocation of the Market Drayton Sports Association Facilities, currently located at Greenfields, to the site identified for this purpose on the Policies Map. The proposal will therefore need to enable sufficient improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site, including the construction of a public footway*

and cycleway along the northern edge of the site and improved traffic management. Any necessary improvements will also need to be considered to the approach to the underpass from Shrewsbury Road."

It has to be questioned what feasibility work has been undertaken to date can be provided as evidence to demonstrate with the necessary certainty, that these enabling housing allocations can actually be delivered, so as contribute to the Town's housing needs, let alone in accordance with the anticipated timescales set out in Appendix 7 of the Local Plan.

Conclusion and Requested Modifications

1. Our client's offers **full support** for the proposed housing allocations off Maer Lane (MDR012 and MDR034), which we consider to be suitable, available and deliverable, early in the Plan period. A minor modification is suggested to the 'Guideline' to include reference to pedestrian connectivity, to the Canal towpath.

2. Our client **supports Policy S11.1(4)** with its reference to the aspiration for a Marina and related uses and enabling development at Victoria Farm

3. Our client **objects** to proposed housing allocations at Longford Turning (MDR039 and MDR043), which should be deleted.

Andy Williams

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Director