

Representation Form

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

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

Part B: Representation

Name and Organisation:	
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Q1. To which document does this representation relate?

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

A. Legally compliant Yes: No:

B. Sound Yes: No:

C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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

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

(Please continue on a separate sheet if necessary)

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

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

(Please continue on a separate sheet if necessary)

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

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

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

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

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

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

(Please tick one box)

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

(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:

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Council Local Plan 2016-2038

Regulation 19



February 2021

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Shropshire Council Local Plan 2016-2038 Regulation 19 Consultation and request to be invited to the upcoming hearing sessions once the Local Plan has been submitted for examination. Gladman are seeking for changes to be made to the Local Plan in relation to the Market Drayton Place Plan Area. Gladman has land interests at Longford Lane, Market Drayton and land to the north of A53, Market Drayton.

1.1.2 Gladman Developments specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in the development industry. From that experience, we understand the need for the planning system to provide the homes and jobs that are required to meet Central Government's objectives and the needs of local communities.

1.1.3 Through this submission, Gladman have suggested areas where the Local Plan's require further clarity or justification in order to be found sound at Examination. One such area is the Market Drayton Place Plan Area where Gladman has multiple land interests. In the consultation document these sites are marked; as MDR39, proposed to be allocated for residential development alongside MDR43; and site MDR42, which is not currently proposed to be allocated. We are supportive of the allocation of sites MDR039 and MDR043 and are also seeking the allocation of site MDR42. Gladman submit that all three sites can be delivered whilst contributing to the future sustainable growth of Market Drayton.

1.2 Structure of Representations

1.2.1 These representations are structures to follow the consultation document where possible and will cover the following key topic areas:

- Legal Compliance;
 - National Planning Policy;
 - Shropshire Council Local Plan 2016-2038 Regulation 19 Policies;
 - Market Drayton Place Plan Area;
 - Site Submissions; and
 - Conclusions.
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1.3 Plan Making

1.3.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
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2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Shropshire must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 2.1.4 Gladman recognise this process is ongoing in Shropshire with further discussions anticipated on assisting the Black Country Authorities in addressing emerging unmet housing needs.

¹ PPG Reference ID: 61-001-20180913

2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 The Shropshire Council Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Shropshire Local Plan Review's decision-making and scoring should be robust, justified and transparent.
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3 NATIONAL PLANNING POLICY

3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

3.1.2 The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 16 of the Revised Framework (2019) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

3.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing

requirements are addressed and that land with permission is developed without unnecessary delay².

- 3.1.4 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. It states:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

- 3.1.5 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and AONB and giving consideration as to where or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided but where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered

- 3.1.6 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the revised Framework (2019).

² Revised NPPF – Paragraph 60

3.2 Planning Practice Guidance

- 3.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans.

3.3 Planning for the Future – White Paper

- 3.3.1 On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2 Consultation recently closed on these proposals and it will be important that the Council keeps up to date with the implementation of these changes and the implications this will in turn have on the preparation of the Local Plan Review. Timescales remain uncertain however, subject to the outcomes of this process, the Government has signalled its intent to make rapid progress towards this new planning system through the swift introduction of new legislation to implement the changes.
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4 SHROPSHIRE COUNCIL LOCAL PLAN 2016 TO 2038 REGULATION 19

4.1 Context

4.1.1 This section is in response to the SCLP consultation document and its supporting evidence base. Herein, Gladman highlight a number of modifications that are required for the Local Plan to be found sound at examination.

4.2 Policy SP2: Strategic Approach

4.2.1 Gladman are supportive of the SP2 and aspirational growth led approach which sets a housing requirement of around 30,800 new dwellings over the plan period (1400 dwellings per year) to support economic and sustainability aspirations.

4.2.2 The PPG is clear that the standard methodology identifies the minimum annual housing need figure and does not establish a housing requirement figure. Ambitions to support economic growth, deliver affordable housing and unmet needs from other authorities should be taken into consideration during the Plan preparation process³.

4.2.3 Gladman highlight that the spatial strategy should balance housing needs alongside the identified employment growth set out in the Site Allocations and Management of Development Plan (SAMDev) and the emerging Shropshire Local Plan. In this regard, Gladman wish to highlight the imbalance of approach in Market Drayton. Market Drayton has been directed 1,200 dwellings over the plan period, 3.9% of the Local Plan housing requirement, yet will deliver 35 hectares of employment land equating to 11.6% of the employment land requirement for the Local Plan. Gladman propose that Market Drayton could and should accommodate further residential development of a level that supports the proposed economic growth of the town. Focussing additional housing in Market Drayton could help keep employment and housing growth in balance, minimising the need to commute and securing a sustainable pattern of development. In this regard, the proposed policy framework in relation to development beyond the settlement boundary of Market Drayton appears to conflict with the positive consideration of housing growth to support economic growth outlined in SP10.

³ Planning Practice Guidance Paragraph: 002 Reference ID: 2a-002-20190220

4.3 Policies SP3: Climate Change and DP11: Minimising Carbon Emissions

4.3.1 Whilst recognising that responding to climate change will be an issue of increasing importance during the plan period it is currently unclear how a number of the requirements of these policies will be applied. It is also unclear whether the viability implications of these requirements have been tested.

4.4 Policy SP4: Sustainable Development

4.4.1 In principle, Gladman are fully supportive of the direction taken in policy SP4, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and affirms the Council's commitment to making local planning decisions based on the delivery of sustainable development. This should provide assurance of a local approach to planning that will actively seek to improve the social, environmental and economic wellbeing of the area by ensuring that development demonstrably contributes to the specific strategic and the local vision and objectives of the SCLP.

4.5 Policy SP6: Managed Housing Development

4.5.1 This policy highlights the importance of residential development guidelines for settlements set out in Policies S1-S20 while further highlighting that additional market housing development outside of settlement boundaries.

4.5.2 Gladman support the use of policies group by area, referred to as 'Place Plan Areas'. This approach allows local character, need and contexts to be accounted for within the Strategic Planning process. However, Gladman object to the strict controlling of additional market housing as set in response to Policy SP9.

4.6 Policy SP9: Managing Development in the Countryside

4.6.1 Gladman object to the use of settlement boundaries in circumstances such as this where they preclude otherwise sustainable development from coming forward. This conflicts with the objectives of the Framework to significantly boost to boosting the supply of housing.

4.6.2 The Framework is clear that sustainable development should proceed without delay in accordance with the presumption in favour of sustainable development, the use of settlement limits is likely to arbitrarily restrict such development from coming forward; this does not accord with the positive approach to growth required and set out in Policy SP2. Gladman

suggest that further flexibility should be provided for within PolicySP9 to consider sustainable development opportunities beyond the development limits identified on the Policy Maps.

- 4.6.3 Due to the rural nature of the County, Gladman suggest that a blanket approach to development beyond the settlement boundary may not be appropriate nor effective. A criterion-based approach that considers additional residential schemes that adjoin the settlement boundaries of the Strategic Centre of Shrewsbury and the Principal Centres may be a more appropriate approach. Gladman are aware that this approach has been used in other Local Plan's that have passed through examination.

4.7 Policy DP1: Residential Mix

- 4.7.1 Gladman recognise the importance of new development opportunities to provide appropriate mixes of housing types, sizes and tenures to meet the identified housing needs of the area. It is important to note that the housing mix as identified in the Council's latest evidence base wonly represents a snapshot in time in relation to the current housing needs.

- 4.7.2 As such, the policy should provide for flexibility going forward so that the Plan is able to respond to changes in circumstances at the time of an application being submitted to the local planning authority so that development opportunities can make better use of the land available whilst responding to the housing needs at that time. In this regard, Gladman support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings.

- 4.7.3 Policy DP1 sets out requirements for all affordable dwellings to achieve the nationally described space standard (NDSS), while market dwellings are encouraged to comply with such standards. Furthermore, sites of 5 or more dwellings are required to meet M4(3) wheelchair user dwellings and M4(2) accessible and adaptable dwellings Building Regulation standards.

- 4.7.4 As stated within the Written Ministerial Statement (WMS) 2015,

"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance."

- 4.7.5 Indeed, the Council has supported the inclusion of such policy requirements with the Local Plan Delivery & Viability Study (2020) compiled by HDH Planning. However, Gladman suggest that further clarity is required to justify the inclusion of the above requirements, notably those included in Paragraph 5 of Policy DP1. Although it appears the impact of applying such
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standards has been assessed within the Viability Study, it is difficult to ascertain the conclusions of the study and therefore how the policy requirements have been derived. Section 8 of the Viability Study does little to justify the policy requirements other than simply listing the standards listed in Building Regulations Approved Document M and Technical Housing Standards documents. The potential impacts should be explored in greater detail.

- 4.7.6 Section 10 and Section 12: Findings & Recommendations only appears to refer to the initial appraisals which were based upon 100% Accessible and Adaptable Category 2, 10% Accessible and Adaptable Category 3; yet the policy requirement requests:

“...5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations and a further 70% of the dwellings will be built to the M4(2) (accessible and adaptable dwellings) or higher standard within Building Regulations”

- 4.7.7 This is justified through the supporting text of Policy DP1, specifically paragraphs 4.24, 4.25, 4.27 and 4.28 which states that the policy is set to respond to data projecting the older persons population alongside wheelchair user data. However, it does not appear that the viability study has acknowledged this data nor has this been data been reflected within the Strategic Housing Market Assessment (SHMA)⁴.

- 4.7.8 Gladman also highlight that a blanket policy approach relation to optional standards and specifically wheelchair accessible properties may not be appropriate across the whole plan area and therefore the requirements may need to vary across locations, sites and schemes.

- 4.7.9 It should be noted that Gladman do not object to the principle of this policy which intends to provide quality living environments for current and future generations. However, Gladman believe that if the Council continue with the policy approach further justification is required.

4.8 Policy DP2: Self-Build and Custom-Build Housing

- 4.8.1 In principle, Gladman support the inclusion of Policy DP2 relating to self-build and custom-build housing in line with current government thinking and objectives. It is key that any such policy is supported by robust evidence with consideration given to financial viability.

- 4.8.2 The Council have maintained a self-build register in line with guidance set out in Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016 and the PPG. However, the PPG further states that,

⁴ Shropshire Council Strategic Housing Market Assessment Report: Part 1 (March 2020)

“Local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the housing and economic development needs guidance), when preparing their Strategic Housing Market Assessment to understand and consider future need for this type of housing in their area. Plan-makers will need to make reasonable assumptions using the data on their register to avoid double-counting households.”⁵

4.8.3 The supporting text for Policy DP2 states,

“According to the SHMA, over the Local Plan period from 2016 to 2038, around 2,400 applications will be made for inclusion on the Self-Build Register. Although not directly comparable, this equates to around 9% of the calculated local housing need. As such it is considered appropriate to encourage larger development sites to make 10% of dwellings available for Self-Build developers, where there is an identified need on the Self-Build Register”

4.8.4 However, there is no reference to these figures or analysis of the self-build local need within the Shropshire Council Strategic Housing Market Assessment Report: Part 1 (March 2020) and no further SHMA publications are provided within the Local Plan evidence base.

4.8.5 Furthermore, the viability study states that the authority would encourage 10% of new dwellings to be made available for self-build plots, highlighting that this policy has been viability tested. However, the conclusions on the viability for self-build plots is not clear in the assessment as no further reference to such housing types is given within the rest of the study or indeed, the findings. In addition, without the SHMA analysing the need for self-build plots it is unclear why viability has been tested against a 10% requirement for self-build plots.

4.8.6 It should be noted that Gladman do not oppose to such a policy but highlight that further evidence should be made available within the SHMA to justify the inclusion of Policy DP2.

4.8.7 Further to this, Gladman urge the Council to ensure the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing. Therefore, Gladman recommend that any policy specific requirement to include a mechanism whereby if the self-build plots are not taken up within a given time period, then these revert back to market housing to be provided as part of the wider scheme. This would

⁵ Planning Practice Guidance Paragraph: 011 Reference ID: 57-011-20160401

provide flexibility and help to ensure that the required housing is delivered. It appears that section d) of the above policy may provide this caveat, however this requires further clarity. Additionally, a time-frame of 36 months marketing before the plots can revert to market housing is a significant period which may impact the delivery of housing across the district. Gladman suggest that further flexibility is required and this marketing period to be reduced.

4.9 Policy DP3: Affordable Housing Provision

4.9.1 Gladman support the current approach of Policy DP3 which proposes different levels of affordable housing provision depending on location within the district as assessed within section 3 of the SHMA and the viability. Gladman further welcome the flexibility within the policy which allows for reduced rates of affordable housing where viability concerns exist.

5 MARKET DRAYTON PLACE PLAN AREA

5.1 S11.1 Development Strategy: Market Drayton Principal Centre

5.1.1 Market Drayton, as one of the Market Towns, is attributed 1,200 dwellings and 35ha of employment land over the plan period. This will primarily be delivered through saved allocations for both residential and employment from the SAMDev, with a number of new allocations seeking to deliver objectives of the draft neighbourhood plan.

5.1.2 Gladman are promoting the site off Longford Turning (MDR39) and are fully supportive of the identification of this site for residential development, subject to supporting the relocation of the Market Drayton Sports Association Facilities (Greenfields Sports Facilities). To achieve this the site will enable sufficient improvements to the pedestrian, cycle and vehicle accessibility to the relocation site. There has been fairly extensive discussions between our highways and transportation engineers and the local highways authority and it is agreed that there are no insurmountable constraints to the proposed housing development, from a highways and transportation perspective. Improved access arrangements are capable of being delivered to support the relocation of the relocated Greenfields facilities.

5.1.3 The site is allocated alongside MDR43 for a combined total of 120 dwellings. Initial master planning work for site MDR39 in isolation has indicated the potential to deliver around 110 dwellings. Gladman therefore consider there to be greater development potential across the two sites and suggest that the two allocations should be separated in recognition of this. A greater development quantum across the two sites would in turn assist in supporting the delivery of the relocation of the sports facilities. Indeed, site assessment of the two sites

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- suggests a development quantum of 150 dwellings across the two sites and Gladman would suggest that this should be carried through to the policies of the Local Plan.
- 5.1.4 Looking at site MDR43 in isolation as currently defined, the area and shape does not seem to lend itself to a well-conceived and high-quality form of development. Gladman respectfully suggest that further work should be undertaken to define an area that makes more efficient use of the land.
- 5.1.5 The overall strategy for Market Drayton can be summarised as delivering growth that supports the aims and objectives of the previously draft neighbourhood plan. Many of the allocations can be found in this draft document. Yet, the Council appear non-committal to this strategy which has resulted in the lack of certainty outlined in Paragraph 3 of S11.1. Gladman suggest this, in part, comes from not allocating the existing sports facilities at Greenfields Sports Facilities for redevelopment. To support the relocation of the sports fields it is important that the current location is released for residential development through an allocation with the expectations and requirements of this site being released for residential development being set out through policy wording.
- 5.1.6 Gladman support the identified location for relocation of Market Drayton Sports Facilities. We confirm that improvements to the pedestrian and cycling routes accessing the relocation site can be made thus supporting the delivery of new and improved Market Drayton sports facilities. In addition, Gladman is aware that the landowners are willing to make this land available for the relocated sports facilities. Therefore, Gladman is confident that the relocation of the existing Greenfields Sports Facilities to the new preferred site is a realisable option.
- 5.1.7 Notwithstanding this issue, Gladman suggest that Market Drayton as a principal centre can and should support more than 1,200 dwellings over the course of the plan period. This figure equates to only around 3.9% of the total housing requirements whereas the requirement for 35ha of employment land is around 11.6% of the employment target. There is a clear imbalance between the two figures, to support the development of the level of employment land anticipated and to avoid unsustainable commuting patterns, further strategic housing growth should be allocated to Market Drayton.
- 5.1.8 In this regard Gladman are promoting land north of the A53 (MDR042) for residential development. The site could potentially deliver around 275 dwellings. It is anticipated that this scale of development could contribute significantly to the needs of Market Drayton and the County over the plan period whilst the level of housing on site can support and capture some of the economic growth ambitions in the north of the County.
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- 5.1.9 Technical work undertaken to date demonstrates that there are no insurmountable constraints to the development of the site. There are no significant infrastructure constraints and the site can be accessed through the installation of an additional arm to the existing roundabout.
- 5.1.10 Having made it to Stage 3 of the site assessment the reasoning the site has not been allocated can be summarised as due to the scale of growth proposed for Market Drayton the focus of housing growth is instead on achieving objectives of the draft neighbourhood plan whilst reducing the need to develop beyond the north of the A53.
- 5.1.11 If allocating further growth of an appropriate level, as suggested by Gladman, it is likely that that this site would need to be reconsidered. The site is located adjacent to the proposed allocation MDR006, which is clearly considered to be in a suitable and sustainable location for housing development with a number of facilities accessible within reasonable walking distance of the site. In addition, the allocation of this site could make substantial S106 contributions towards helping achieve either the improvement of or the relocation of the existing Greenfields Sports Facilities, assisting in resolving the current uncertainty around this relocation.
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6 SITE SUBMISSIONS

6.1 Land off Longford Turning, Market Drayton (MDR039)

6.1.1 Gladman are promoting land off Longford Turning, Market Drayton for 110 dwellings and support the Council’s decision to allocate this site for development land under Policy S11: Market Drayton Place Plan Area (Land at Longford Turning, Market Drayton Allocation Site Reference: MDR39). Figure 1 sets out the location plan of the site, while a development framework plan is included in Appendix 1 of this representation.

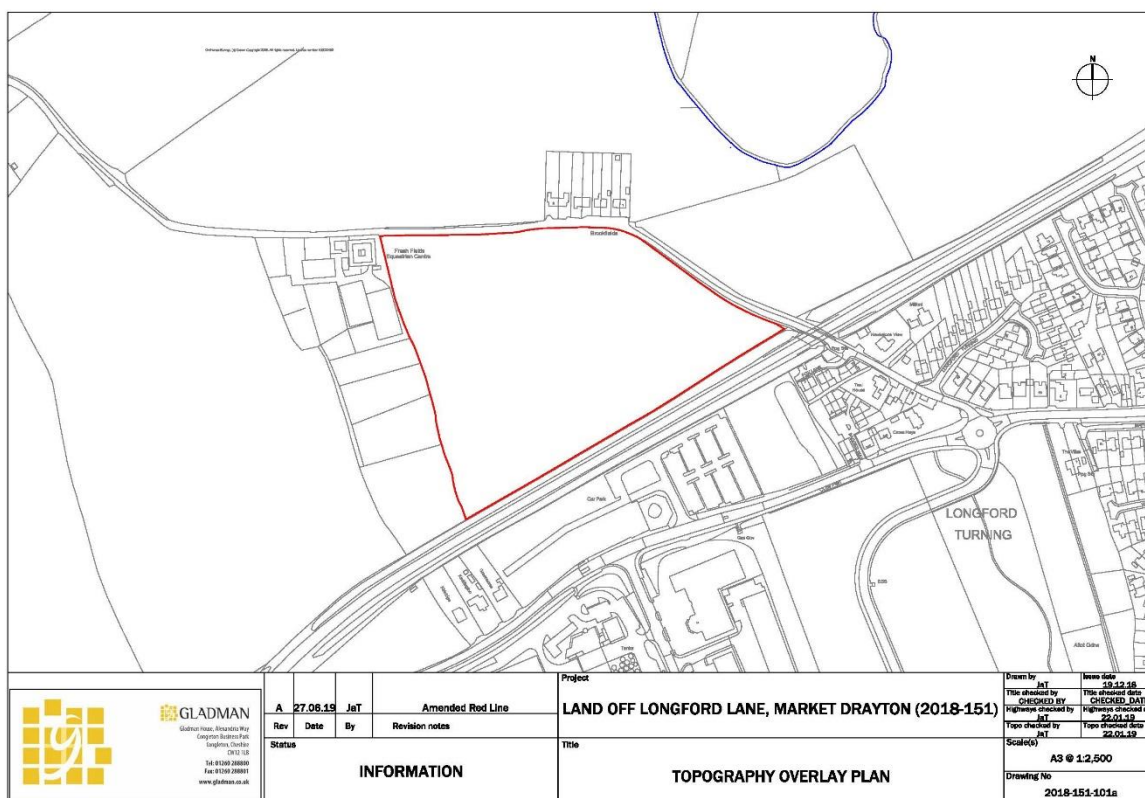


Figure 1 – Land off Longford Lane, Market Drayton – Site Location Plan

6.1.2 The Site is within walking distance of a number of facilities within the original Little Drayton, including a local supermarket, a public house, hairdressers, Christ Church and local takeaway establishments. Further afield the town centre of Market Drayton is well-served by a wider range of services and facilities, approximately 2km (1.3 miles) from the Site. These include retail/homeware stores, supermarkets, a library, a community theatre, banks, nursery, primary and secondary schools, doctors surgeries and pharmacies, public houses, and restaurants.

6.1.3 Market Drayton also benefits from significant employment opportunities, not only from the retail offer but, also Adderly Lane, Maer Lane Industrial Estates and Tern Valley Business Park with further employment growth proposed within the emerging Local Plan period.

6.1.4 The nearest bus stops are located on Shrewsbury Road approximately 390 metres from the centre of the Site. The buses that operate from these stops provide services to Market Drayton town centre and Shrewsbury town centre.

6.1.5 Alongside the delivery of affordable housing and the support for the relocation of sports facilities currently located at Greenfields, development of the site will offer the opportunity to deliver a number of other benefits, including:

- Provision of new public open space, including a new children's play area;
 - Footway and cycleway providing connections into Market Drayton;
 - Retention of existing hedgerows and trees on the boundaries of the site as wildlife corridors and habitats;
 - Landscaping and sustainable drainage system (SuDS); and
 - New vehicular access point from Longford Road.
-

6.2 Land North of A53, Market Drayton

6.2.1 Gladman have further land interests within Market Drayton and are promoting land to the north of A53. A site location plan is set out below in Figure 2 and a development framework plan can be found at Appendix 2 of this representation.

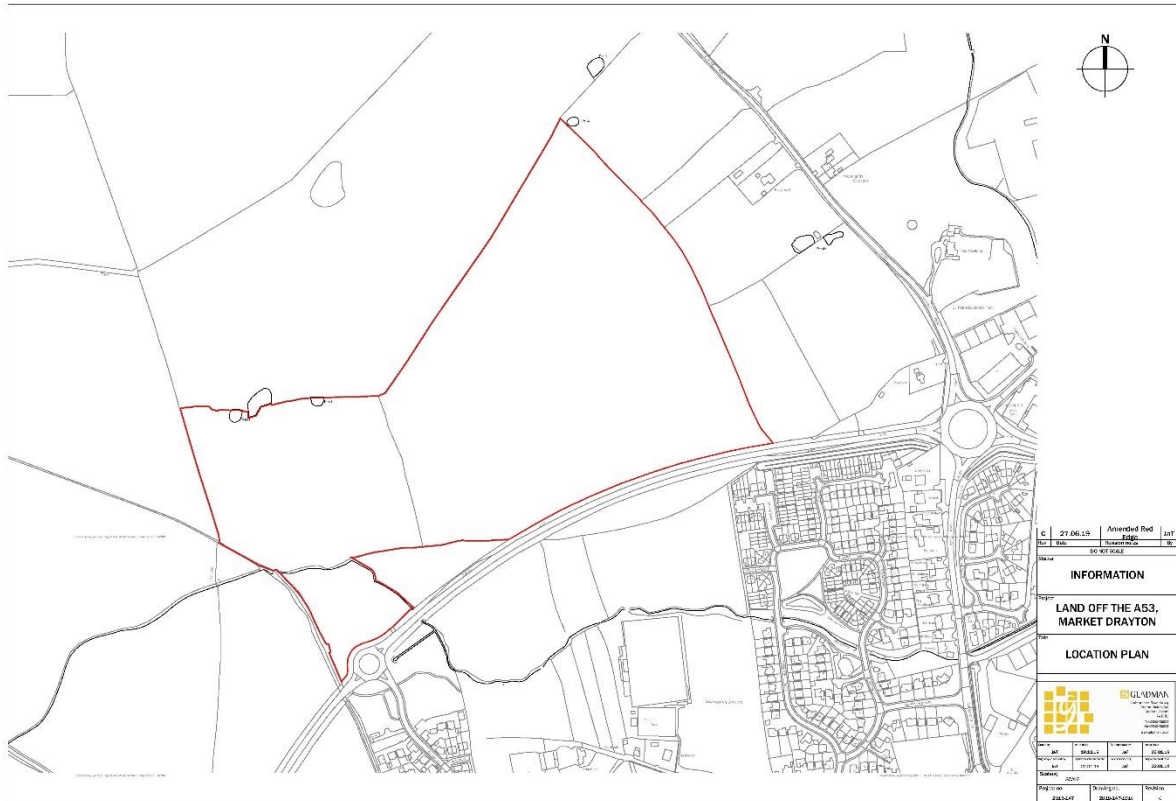


Figure 2 – Land off the A53, Market Drayton – Site Location Plan

6.2.2 The Site is situated to the north of the A53 bypass, adjacent to the northern built edge of Market Drayton and is located within a 10-15 minute walk from the majority of facilities within Market Drayton town centre, including supermarkets, a medical centre and the sites of major employers within the town. The Site's location also provides convenient access to the A53, providing a direct connection to Newcastle-under-Lyme, and also the public transport network through the bus station in the centre of Market Drayton which is located a 15 minute walk from the centre of the Site.

6.2.3 The land can be capable of delivering approximately 275 new homes of varying sizes, types and tenures alongside affordable housing provision that meets the Council's needs. The development offers the opportunity to deliver a number of benefits, including:

- New vehicular access from the A53 through provision of a new roundabout on the bypass;

- New publicly accessible, attractively landscaped open space, including a new children's play area. In total 42% of the total site area will be public open space;
- Recreational footways and connections the existing public right of way network;
- Landscaping and sustainable drainage system (SuDS) providing a green corridor through the centre of the site; and
- The residential development will be set back from the A53 to allow for an attractively landscaped frontage with new tree and hedgerow planting, retaining vegetated approach into the settlement.

6.2.4 Gladman would welcome further discussions with the Council's officers as we look to realise the development potential of land North of the A53 and the role that the site could play in meeting the areas housing needs. The site is deliverable, available and offers a suitable location for growth.

6.3 Land at Longford Turning, Market Drayton (MDR043)

6.3.1 As well as Land off Longford Turning, Gladman are working with the landowners of land at Longford Turning, Market Drayton. We support the proposed allocation of this land.

6.3.2 We welcome the opportunity to work the Council in shaping this allocation and are seeking further engagement in this regard. As already stated, as currently defined, the area and shape of the proposed allocation does not seem to lend itself to a well-conceived and high-quality form of development. We would be happy to work with the Council in determining an appropriate shape and area which reflects the development quantum across this and site MDR39, as assessed in the Sustainability Appraisal.

7 CONCLUSIONS

7.1 Conclusions

7.1.1 Gladman welcome the opportunity to comment on the Shropshire Council Local Plan 2016-2038 Regulation 18 Consultation and wish to be informed of future consultations in the plan-making process. For the Shropshire Council Local Plan to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:

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

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

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

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

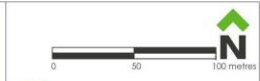
7.1.2 Gladman are seeking for changes to be made to the Local Plan in relation to the Market Drayton Place Plan Area and request to be invited to the upcoming hearing sessions once the Local Plan has been submitted for examination.

APPENDIX DIVIDERS

Appendix 1 - Land off Longford Turning, Market Drayton – Development Framework Plan



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- Site Boundary: 5.26ha
 - Main vehicular route
 - Secondary vehicular routes and Existing bus stops
 - Existing public footpaths
 - Shropshire Local Plan Review: Consultation on Preferred Sites Nov 2018: **Protected Employment Site**
 - Shropshire Local Plan Review: Consultation on Preferred Sites Nov 2018: **Proposed Housing Site**
 - Land where Alternative Use for Recreation will be Permitted (Policy MDNDF3): Market Drayton Neighbourhood Development Plan 2016-2026
 - Proposed developable area: 3.13ha (Up to 110 dwellings @ 35dph)
- Movement & Infrastructure**
- Proposed vehicular access point
 - Proposed spine road through the development
 - Proposed secondary streets
 - Proposed recreational routes
- Green Infrastructure**
- Existing vegetation
 - Proposed public open space (to include play area, new landscaping and SuDS features)
 - Proposed new landscaping
 - Proposed locations for SuDS features (attenuation basins)
 - Proposed location for children's play area - LEAP (Locally Equipped Area for Play)

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Project	Land off Longford Turning, Market Drayton		
Title	Development Framework Plan: Option 3		
Client	Gladman Developments Ltd		
Scale	1:2500 @ A3	Drawn	SM
Date	March 2019	Checked	RR
Drawing No.	CSA/4166/111	Rev	D

Rev	Date	By	Description
D	03.04.19	SM	Amended to reflect client's comments
C	29.03.19	JFB	Updated to reflect access strategy
B	21.03.19	JFB	Amendments to SuDs
A	21.02.19	BT	Amendments to road names

Appendix 2 - Land North of A53, Market Drayton – Development Framework Plan



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