Point 3 and MDR039 and MDR043 Land at Longford Turning

Sites MDR039 and MDR043 are located to the north east of Market Drayton, a map illustrating its location is displayed in Figure 1.

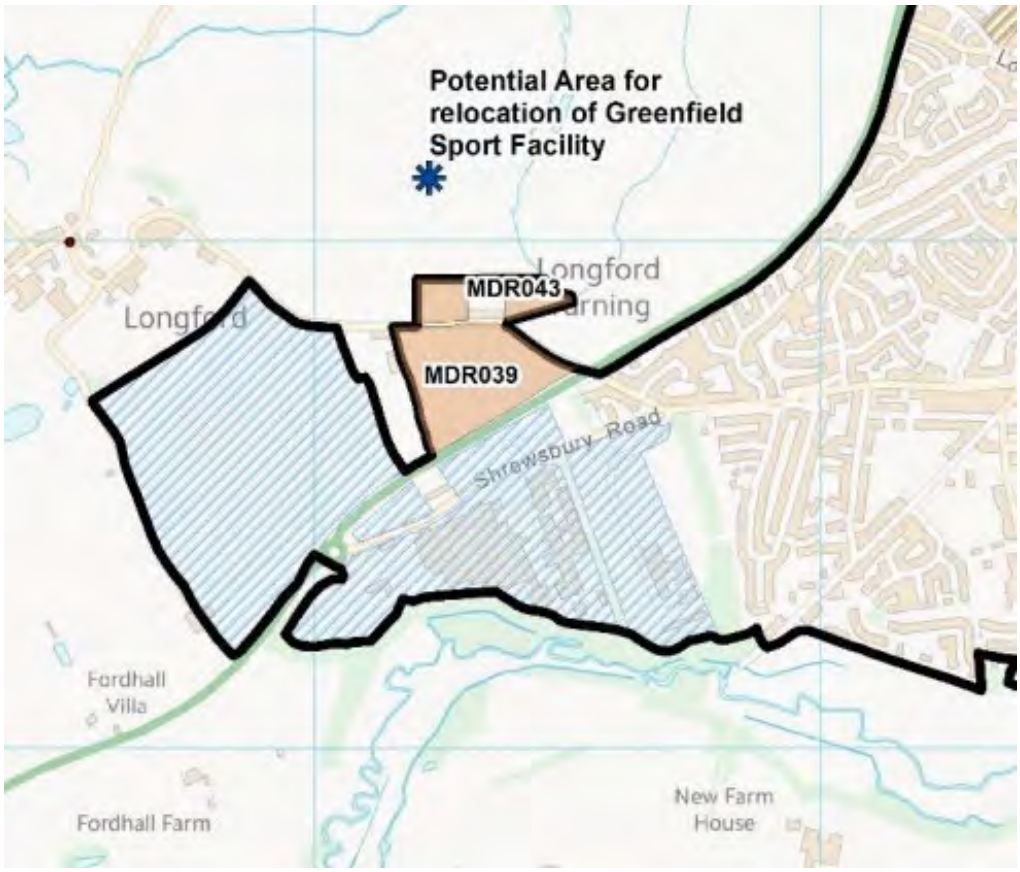

Figure 1: Market Drayton Preferred Site Allocations Map (Source: Shropshire Council)

The Council's Sustainability Appraisal identified that the site has several constraints which include; being located significant distances from a GP surgery, library, leisure centre, primary school, children's playground, outdoor sports facility and amenity green space.

The site is located to the north of Market Drayton and north of the A53. This parcel of land is undeveloped and has an important rural character. The landscape is relatively sensitive and open. The gradient of the site exacerbates the visual sensitivity of the site.

Immediately south of the site, on the other side of the A53 is a large business park which has a commercialised character. The impactful views of the industrial land are offset by the rural landscape adjacent. Again, the distinction in characters between rural and urban on either side of the A53 are clear. Development to the north of the A53 would have harmful impacts on Market Drayton's rural market town character. As illustrated in Figures 2 and 3, the sites are physically detached from Market Drayton, with poor access links. A copy of any potential master plans was requested from the Council; however, one was not provided in advance of the consultation deadline.

The Council considered these sites within its sustainability appraisal and gave both a score of - 9 which are categorised as 'poor' sustainability scores.

Figure 2: MDR039 Photograph

Figure 3: MDR039 Photograph

These sites were allocated within the draft version of the Market Drayton Neighbourhood Plan as Policy MDNDP6. The Planning Inspector appointed to examine the draft Neighbourhood Plan commented on these sites as follows:

"7.5 Policy MDNDP6 supports the development of sites off Longford Road for housing, as shown on Map 4. This shows two parcels, one "carved out" of the Recreation Site allocation (and enveloping some existing housing) and a larger plot, separated by the road and reaching to the A53. The purpose of these allocations is to "…assist the delivery of the formal and informal recreation proposal advanced under Policy MDNDP3…". The difficulty is that it is far from clear how it will do this.

7.6 Similar issues as with the other housing allocations appear here: the site selection process, to demonstrate suitability; a robust assessment; the justification for the extent of the sites selected; and the deliverability of the policy all remain unresolved.

7.7 The unresolved issues over consultation with the neighbouring parishes remain a significant concern."

The Planning Inspector has determined that this site is not achievable nor viable for residential development to meet the identified housing need in Market Drayton. It is contended that the Council have still not been through a robust assessment of the sites, and clearly demonstrated why this option is the most sustainable for Market Drayton. It has failed to demonstrate that there is no alternative location for sports facilities and why the existing facilities can't be improved. In addition, point notes no site-specific viability assessments have been published, which demonstrates this is still a deliverable option.

As illustrated in the sustainability appraisal, there needs to be a significant improvement to the access to the site due to its detachment from Market Drayton. The Council has failed to demonstrate that this a deliverable, viable and achievable site.

Site MDR012: Land to the east of Maer Lane, north of the A53

Site MDR012 is located to the northeast of Market Drayton, a map illustrating its location is displayed in Figure 4.

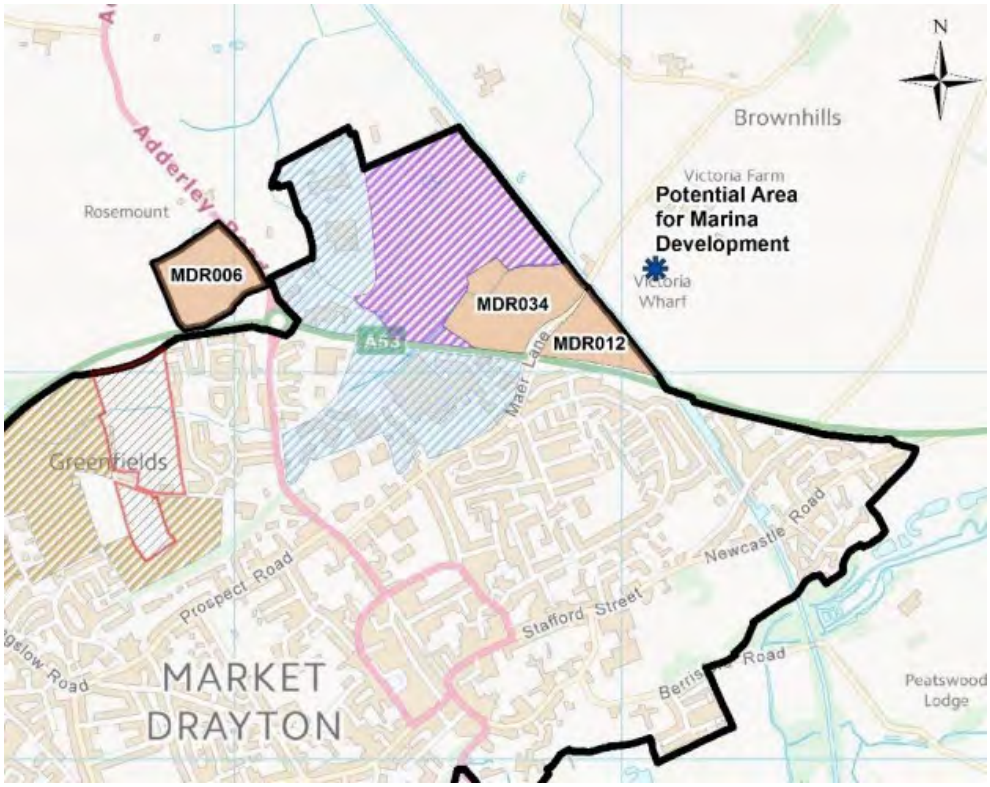

Figure 4: Market Drayton Preferred Site Allocations Map (Source: Shropshire Council)

The Council's sustainability appraisal identified that the site has a number of constraints which include; being partially located within a Flood Zone, being located significant distances from a GP surgery, library and leisure centre and being located close to a conservation area and a listed building.

Furthermore, the site is located a significant distance away from accessible natural open green space as identified by the sustainability appraisal. This, however, has been identified as a constraint of all sites within Market Drayton further emphasising the demand for improved areas of accessible natural open green space. Our proposals for MDR 014 and MDR 031 include the ability to provide a significant country park for Market Drayton.

The site is located north of the A53, where there is little residential development. The area to the north of A53 is categorised by rolling hills and agricultural land with some employment development likely derived through agricultural diversification. There is a clear distinction of rural and urban between land north and south of the A53. The allocation of housing to the north of A53 would have significant visual impacts and should be considered encroachment into the open countryside.

Overall, the Council's sustainability appraisal allocated the site a score of - 5 which is categorised as a 'fair' sustainability score.

This site was allocated within the draft version of the Market Drayton Neighbourhood Plan as part of Policy MDNDP4. As discussed earlier, the 'Preferred Sites' consultation document highlighted that the Local Plan Review was required to align itself with the Neighbourhood Plan. However, the document continued that:

"If, in due course the Neighbourhood Plan does not proceed to adoption, the Local Plan Review will need to provide additional certainty for housing delivery up to 2036 which will involve the allocation of additional land."

The Planning Inspector appointed to examine the draft Neighbourhood Plan commented on this site as follows:

"7.1 Policy MDNDP4 allocates land at Maer Lane (and shown on Map 3) to help deliver the marina development. The allocation is on two parcels, separated by a road. I repeat my concerns over the site selection process, which lacks robustness, as does the extent of the sites needed for housing. And the supporting text (4.24) confusingly suggests that "..the sites would be appropriate for at least an element of housing…".

7.2 I can find no evidence for these sites to viably support the marina development; or the extent to which it can be delivered that would fulfil the criteria set out in the policy, notwithstanding the support from the developer who has only recently entered into a Promotion Agreement. The site's flood risk, raised by representations, is not resolved."

The Planning Inspector has determined that this site is not achievable nor viable for residential development to meet the identified housing need in Market Drayton.

The proposed policy includes: *The opportunity for the development of a new marina at land adjacent to Victoria Wharf is a locally held aspiration and should be considered as part of the development of this site. Where a proposal for a new marina in this location is suitably advanced, development on this allocated site will be expected to contribute to initial feasibility work as a contribution to supporting this opportunity.*

It is unclear from this if the marina, is coming forward as part of the proposal or will this be delivered through an alternative arrangement and if so, who will facilitate this.

The Council have failed to demonstrate that this is a deliverable site, and whether it is a viable option, and provide sufficient clarity that this site will or won't include a marina.

Site MDR034: Land to the west of Maer Lane, north of the A53

Site MDR034 is located to the north east of Market Drayton and adjacent to site MDR012, a map illustrating its location is displayed at Figure 5.

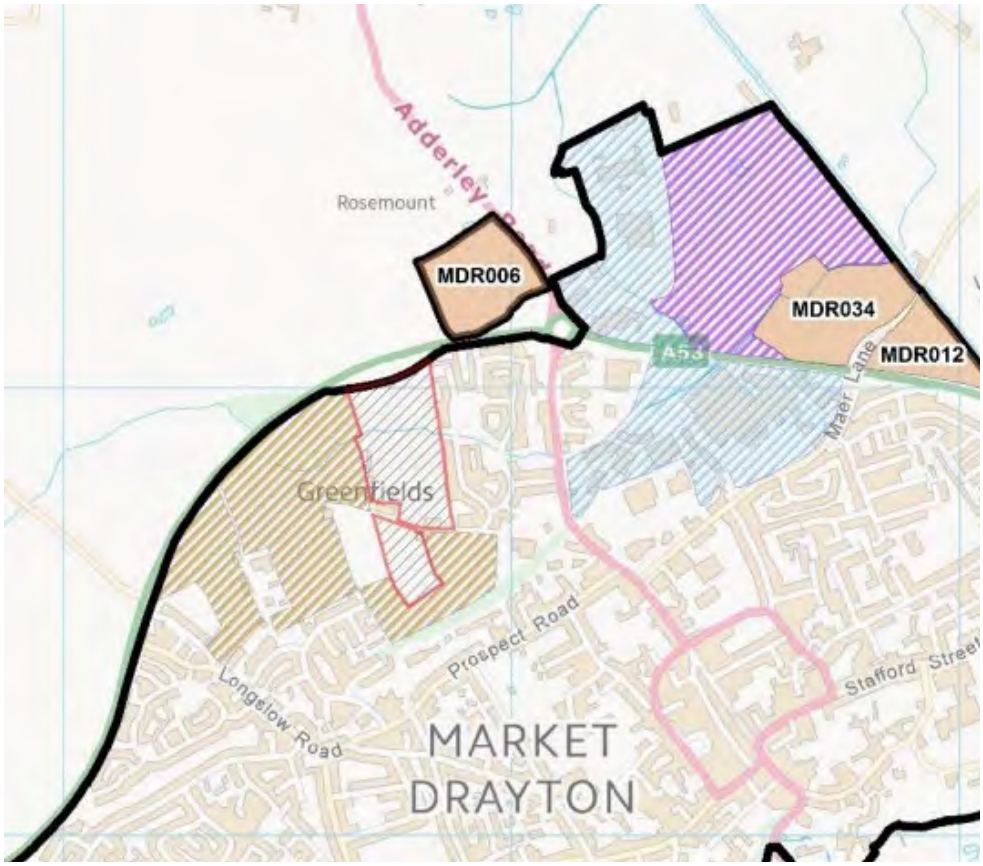

Figure 5: Market Drayton Preferred Site Allocations Map (Source: Shropshire Council)

The Council's sustainability appraisal identified that the site has a number of constraints which include; being partially located within Flood Zone's 2 and being located significant distances from a library and leisure centre and being located a short distance away from a listed building.

As previously discussed, the sustainability appraisal has identified that the site is not near to any easily accessible natural green space. This is a constraint for Market Drayton as a whole. Our proposal seeks to provide access to natural green space to meet the identified demand.

The site is located north of the A53, where there is little residential development. The area to the north of A53 is categorised by rolling hills and agricultural land with specks on employment development likely derived through agricultural diversification. There is a clear distinction of rural and urban between land north and south of the A53. The allocation of development to the north of A53 would have significant visual impacts and should be considered encroachment into the open countryside. It is considered that development would be more appropriately positioned on land to the south of the A53.

The Council considered this site within its sustainability appraisal and gave it a score of - 2 which is categorised as a 'fair' sustainability score.

This site was allocated within the draft version of the Market Drayton Neighbourhood Plan as part of Policy MDNDP4 alongside site MDR012. The Planning Inspector appointed to examine the draft Neighbourhood Plan commented on this site as follows:

"7.1 Policy MDNDP4 allocates land at Maer Lane (and shown on Map 3) to help deliver the marina development. The allocation is on two parcels, separated by a road. I repeat my concerns over the site selection process, which lacks robustness, as does the extent of the sites needed for housing. And the supporting text (4.24) confusingly suggests that ".the sites would be appropriate for at least an element of housing…".

7.2 I can find no evidence for these sites to viably support the marina development; or the extent to which it can be delivered that would fulfill the criteria set out in the policy, notwithstanding the support from the developer who has only recently entered into a Promotion Agreement. The site's flood risk, raised by representations, is not resolved."

The Planning Inspector has determined that this site is not achievable nor viable for residential development to meet the identified housing need in Market Drayton.

The draft plan seeks to allocate 120 dwellings to the site. However, the Council's Sequential Test and Exceptions report, notes that 35% of the site is located within Flood Zone 2 and 3. It has not been demonstrated how all the housing requirement can be accommodated on the site, without being located within a flood zone. Copies of master plans have been requested from the Council, but unfortunately, we did not receive one prior to the consultation deadline. This could significantly impact the viability of the site, along with the provision or contributions towards the marina. The site is located in a sensitive landscape area, and tall development should be avoided, this again may limit the deliverability of the site.

The Council have failed to demonstrate that they have appropriately considered alternative sites, particularly those not within a flood zone. In addition, the Council have failed to demonstrate that the scheme is viable and this level of development can be accommodated on the site.

Site MDR006: Land adjoining Adderley Road, Market Drayton

Site MDR006 is located to the northeast of Market Drayton, a map illustrating its location is displayed in Figure 6.

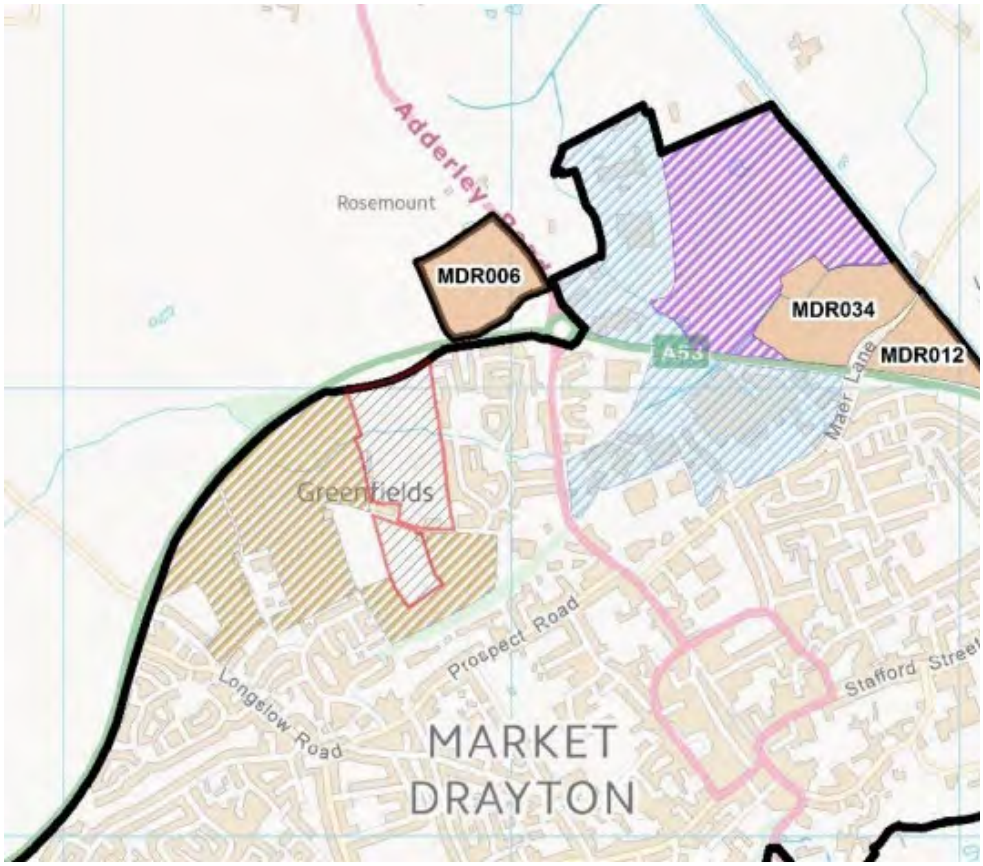

Figure 6: Market Drayton Preferred Site Allocations Map (Source: Shropshire Council)

The Council's sustainability appraisal identified that the site has a number of constraints which include; being located significant distances from a GP surgery, library, leisure centre and primary school. The site also does not have suitable access to natural green open space.

The site is located to the north of Market Drayton between the A53 and the A529. This parcel of land is undeveloped and has an important rural character. The land to the east of the A529 is more commercialised and built up. There is a clear distinction between the employment development to the east, the residential development to the south and this site. The difference in character is a pivotal element in Market Drayton's character.

Development on this parcel of land would encroach into the open countryside and degrade the rural appearance of this market town.

The Council considered this site within its sustainability appraisal and gave it a score of - 3, which is categorised as a 'fair' sustainability score.

This site was not allocated within the draft Market Drayton Neighbourhood Plan.

The site is quite detached from Market Drayton, and the A53 acts as a natural and physical barrier to the site. The proposed policy includes a number of site-specific requirements, including green infrastructure, buffers, acoustic buffers, sustainable drainage etc, along with 125 dwellings. The Council have failed to demonstrate that all these elements can be accommodated on the site and that this policy is deliverable and achievable.

As a result, we believe the Council have failed to demonstrate that the housing options are deliverable, achievable and viable. Albeit we do not that the landowner has undertaken technical work and masterplanning for the site. We believe that our proposals offer a deliverable solution and can be allocated in part or full to help meet the needs of Market Drayton.

Alternative option

Sites MDR014 and MDR031 provide a deliverable alternative.

Figure 7: Site Location

The sites are available individually or as a pair. If delivered as a pair, the landowner is able to open up the Tern Valley as a natural green space as part of the proposal which would help negate the shortage of natural green space in Market Drayton.

Figure 8: Wider site master plan

MDR014 – A retirement community with some residential

Figure 9: Potential Master Plan for MDR014

This site has the potential to deliver a retirement community which helps meet the growing need for older person accommodation in Market Drayton. There is an acute need for such facilities in the area. We have commissioned Knight Frank who have found there is a significant shortfall of such accommodation. Such homes have significant benefits as they allow residents to downsize when they are ready, which release their

homes into the property market. It also generates significant economic benefits through job creation, and social benefits by creating a community for older persons.

MDR031 Residential development within the settlement boundary

Figure 10: Potential Master Plan for MDR031

Figure 10 demonstrates that MDR031 could deliver approximately 90 homes, and a small country park, along with new public footpaths, children play areas. This site is located within the established settlement boundary of Market Drayton. The site has been used an informal open space via short term lease to the Council. The site is due to close soon, with only the public rights of ways to be retained. The proposal would allow long term arrangements to access the open space. The proposal seeks to provide an integrated community of residential properties with green infrastructure interwoven throughout. The proposal would retain and formalise a number footpaths which are currently not formal public rights of way. The proposal is located neatly between the Tern Valley Business Park and the Sherwood Crescent Estate. The proposal would provide homes well located within the local highway network and close to employment opportunities at Muller, for example. The site is flat with no deliverability restrictions. The land is in a single ownership and can be brought forward quickly.

If both MDR014 and MDR031 were brought both allocated. The proposed new open spaces and green infrastructure/river corridor allows for carefully designed new ecology and biological opportunities which will help develop local ecological populations. In addition, the careful design of the area, provides opportunities for new lakes and drainage facilities which could assist with natural flood mitigation measures. Our proposal are supported by ecology assessments we have found that there is limited ecological interest in the sites, and that the sites have historically been poorly managed whilst in the Council's lease. Our proposal could offer comprehensive management and enhancement of such spaces.

Conclusion

This document demonstrates that the land is suitable, available and achievable for housing or employment development. The land is in a single ownership and can be brought forward quickly to meet the housing need, and meets the requirements of the NPPF (2019).

We therefore respectfully request that the Council considers MDR014 as a key allocated housing site for retirement living and land at MDR031 allocated housing site and allocate them within the Shropshire Local Plan Review. Space has been left for a potential community facility and we would like to investigate this further with the Council for doctors or nursery or any other community facility and would consider the revision of the scheme to include certain larger community facilities if and where they are required in the local area. If both options were allocated than this would viable allow for the Tern Valley to be completely opened up as natural open space.

We look forward to working with the Council to facilitate the exciting development which will make a significant contribution to the local community and environment of Market Drayton and to Shropshire. We respectively request that MDR014 and MDR031 are considered for allocations within the plan. As demonstrated the sites suggested within the plan have a number of deliverability and viability issues which restrict them being brought forward in its current form the plan is unsound for Market Drayton.