



For Shropshire Council use
Respondent no:

Market Drayton Neighbourhood Plan Publication Consultation

Response Form

Consultation period ends:
Tuesday 24 July 2018

Shropshire Council is inviting representations on the submission version of the Market Drayton Neighbourhood Plan, prepared by Market Drayton Town Council.

Representations must have been received by Shropshire Council no later than **5pm on Tuesday 24 July 2018**. Representations received beyond this date will not be considered.

Representations can be submitted by e- mail to planning.policy@shropshire.gov.uk or by post to: Planning Policy, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND

1) Your details: Who is making these representations?

Name:	Stuart Morgans
Organisation (if applicable):	Sport England
Address:	SportPark, 3 Oakwood Drive, Loughborough, LE11 3QF
Email:	
Telephone:	

2) If you are an Agent, please use the following box to tell us who you are acting for:

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

3) Do you support or object to the Market Drayton Neighbourhood Plan? (Please tick a box)

Support X
 Object

4) Your representations

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

Section of the Plan	Comments
1. Introduction and Background	
2. Shropshire Local Plan (Core Strategy and SAMDev Plan) Context	<p>Sport England notes the reference in paragraph 2.10 to the Shropshire Open Space Assessment and Shropshire Playing Pitch Improvement Plan that have informed the LDF Infrastructure Plan and Place Plans in setting out infrastructure needs.</p> <p>In respect of playing pitches, in order to appropriately assess need and identify priorities for investment to meet that need, it is necessary to develop a robust up-to-date evidence base (ie. a Playing Pitch Strategy) in accordance with paragraphs 70, 73 and 74 of the NPPF.</p> <p>The existing Playing Pitch Strategy (PPS) was adopted in 2010 and is no longer considered to be up to date as required by para 73 of the NPPF.</p>

	<p>Shropshire Council have recently committed to undertake a new playing pitch strategy which will then provide an up to date evidence base regarding infrastructure needs for sports pitches across the County. The new Playing Pitch Strategy would therefore be the appropriate evidence base to inform the Neighbourhood Plan in respect of playing pitches, rather than the Playing Pitch Improvement Plan which is now out of date, and therefore does not provide an up to date assessment of demand and supply of sports pitches in the area.</p> <p>Without an up to date evidence base plans can be found to be unsound. An up to date PPS will help protect existing facilities and justify any infrastructure contributions via CIL.</p> <p>In respect of indoor sports facilities, reference should be made to the Indoor Leisure Facilities Strategy for Shropshire 2018-2023, and in particular the role that the existing facilities at Market Drayton Swimming Centre and Grove School play in meeting local needs, including future investment in these facilities to deliver the identified action plan, such as developing the facility mix and ensuring the future sustainability of these facilities is protected.</p>
<p>3. Vison, Issues and Objectives</p>	<p>In relation to para 3.3, Sport England supports the references to providing excellent sports and leisure facilities, and to support high quality, accessible health and care services with a focus on well-being. We see these as being interrelated themes. It is now widely recognised that sport and physical activity play an important role in fostering mental and physical well-being amongst the local community, and so it would be beneficial for the vision to acknowledge the opportunities that excellent sports facilities provide in allowing Market Drayton residents to lead more active and heathy lifestyles.</p> <p>Sport England notes and supports the inclusion of sporting facilities within the objectives. The wording “To ensure adequate provision...” does not seem to align with the vision of providing “excellent sports and leisure facilities”, and it is suggested that the objective is re-phrased as this does not seem to be sufficiently aspirational to fit with the vision set out above. It may be better to refer to meeting existing and identified future needs through the provision of high quality community, recreation and sporting facilities, or something similar?</p> <p>There is an opportunity in objective 2 to reference active travel to promote improved facilities for walking and cycling which would tie into the vision of promoting active and healthy lifestyles.</p> <p>There is an opportunity in objective 5 to promote community use of local education facilities where possible, to enhance accessibility to sporting facilities such as school playing fields and sports halls.</p> <p>In relation para 3.6, objective 2 on page 14, Sport England broadly supports the objective identified. The proposals for relocation of Greenfields and</p>

	<p>provision of additional playing pitches should be informed by an up to date playing pitch strategy. Protection of formal sports facilities should be in accordance with planning policy in para 74 of the NPPF.</p>
<p>4. Planning Policies</p>	<p><u>MDNDP1 – Proposed Marina Development</u></p> <p>Sport England supports this mixed-use development proposal which includes retail and related leisure uses, and would suggest that this could include indoor sport and recreation uses such as gym/fitness where this is demonstrated to complement the town centre. Tourist provision to include hotel/conference centre might also provide an opportunity for gym/fitness facilities. It is noted that there is a requirement for improved an footpath link from the site to the Town Centre, however in order to maximise the benefits of active travel it would also be appropriate to include appropriate provision for cycling.</p> <p><u>MDNDP3 - Longford Turning</u></p> <p>Para 4.15 – Sport England does not agree with the statement made in the latter part of this paragraph that relocation of the playing field at Greenfields would remove a potentially inappropriate relationship between the allocated housing sites in the SAMDev and the existing sports facilities. The relationship is not inappropriate, if it was the housing allocation would not have accepted by the SAMDev Plan Inspector. There is no evidence that the existing allocation gives rise to conflicts of residential amenity as stated in this text. It is accepted that the housing allocation now limits the potential for expansion of sports facilities, and so it is recommended that this paragraph is amended accordingly.</p> <p>Sport England is generally supportive of the proposal to relocate the existing sports facilities at Greenfields so long as this accords with the guidance in the NPPF para 74 and exception E4 of Sport England’s Policy :</p> <p>‘The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:</p> <ul style="list-style-type: none"> • of equivalent or better quality, and • of equivalent or greater quantity, and • in a suitable location, and • subject to equivalent or better accessibility and management arrangements.’ <p>Sport England objects to the current wording of the policy as this does not</p>

accord with para 74 of the NPPF and Exception 4 of Sport England's policy.

The proposed policy uses the wording "formal and informal recreation space...", which should be amended to read "formal and informal sport and recreation space..." to more accurately reflect that Greenfields provides formal sporting facilities. The next sentence should then be amended to read "This shall include provision for the relocation and enhancement of playing pitches and associated facilities for football, rugby and tennis..."

The wording of the policy should also be amended to reference the test of equivalent or better quality and quantity in a suitable location and subject to equivalent or better accessibility and management arrangements to ensure it is consistent with Sport England policy and the NPPF para 74.

The proposed allocation seeks to provide sufficient land to ensure that in addition to re-locating the existing facilities, there is also enhanced provision to meet the requirements of the Playing Pitch Strategy and the Market Drayton Place Plan, including provision to meet the needs of new housing development.

As set out above, the existing 2010 PPS is out of date and so the development of the proposed facilities at Longford Turning should be informed by the forthcoming 2018 PPS. Whilst it is noted that the allocated site is larger than Greenfields, and therefore has the potential to provide equivalent or greater quantity, in the absence of an up to date playing pitch strategy it is not possible to comment on how much land is required to provide an appropriate amount of playing pitches to meet local needs. The quantitative provision of land at Longford Turning should therefore be reviewed once the PPS has been completed to ensure that there is sufficient land allocated to make provision for additional formal sports pitches to meet local needs identified in the PPS.

In respect of the quality of playing field provision, this will need to be assessed to identify and address any constraints that would affect playing field quality such as works to ground levels, drainage, soils structure, cultivation and other operations associated with grass and sports turf establishment, and to make appropriate re-provision for floodlighting, pavilion changing, spectator facilities, car parking, social facilities etc at least equivalent or better to the existing facilities at Greenfields. Where evidenced by the PPS, it is likely that there will be requirement for a 3G artificial pitch at this site and so the policy should make appropriate provision for this.

There are concerns that the proposed site is not as accessible to the local community by walking and cycling compared to the existing location at Greenfields, not only because of the lack of pedestrian/cycle paths in the local highway, but also because the proposed location on the west of the town is less accessible for residents in the eastern areas of Market Drayton compared to the current location at Greenfields.

In order to address the lack of accessibility for walking and cycling to the proposed site, a new footway and cycleway is proposed within policy

MDNDP6, and this policy requires these improvements to be implemented prior to the release of MDNDP6 for housing. To ensure that the enhanced facilities for walking and cycling are provided and available for use when they are needed, the policy needs to ensure that they are required to be delivered upon implementation of the Longford Turning sports development and the associated release of the Greenfields site for housing. Linking implementation to the housing allocation at Longford will not ensure its delivery to be available when it is needed, if this housing site does not proceed, or if it proceeds after implementation of the replacement sports facilities.

In terms providing “equivalent or better management arrangements” Sport England takes this to mean all aspects that govern the running of a playing field facility including ownership arrangements (ie. security of tenure), rental and maintenance costs, management charges, opening hours, community access, staffing and any restrictive covenants. They also include any revenue generating activities that support the running of the playing field facility such as a clubhouse social facilities, bars, catering and advertising. There will be a need to demonstrate that the proposals at Longford Turning will address these matters to be at least equivalent or better than the existing facilities at Greenfields.

The policy needs to set out that planning proposals brought forward for this site will be expected to provide details of any proposed phasing to ensure continuity of sports provision, relative to the development of Greenfields for housing. Any proposed phasing of provision will require consultation with the Sports Association, the sports clubs and the National Governing Bodies (FA, Football Foundation, RFU and LTA) to minimise disruption to sports use.

In respect of para 4.18 regarding the requirement to provide 16 hectares to meet assessed future needs, its not clear which assessment this is referring to, but the appropriate assessment for playing field provision would be the forthcoming Playing Pitch Strategy.

Paragraph 4.21 makes reference to possible provision of informal open space, allotments and a cemetery. Sport England has no objection to complementary open space provision so long as the provision of replacement sports pitches and associated facilities are not compromised to meet the policy tests set out above and to ensure that local needs for sports pitches are met in accordance with the evidence set out in the new Playing Pitch Strategy.

MDNDP5 – Greenfields

As with policy MDNDP3, the wording of this policy does not meet the guidance in para 74 and Sport England’s policy Exception E4, and so Sport England objects to the current policy wording.

To address this some wording changes are required. In the first line it would be appropriate to use the wording “...comprising Greenfields sports and

recreation area...”

In a), the wording should be amended to “suitable alternative provision is made for a sports and recreation area including playing pitches and courts, associated buildings, floodlighting, car parking, spectator facilities and other associated infrastructure that is “equivalent or better quality, equivalent or better quantity, in a suitable location and subject to equivalent or better accessibility and management arrangements, to be fully implemented and made available for use prior to the commencement of development of the site for housing to ensure continuity of provision of sports facilities”

In b) add the words, “providing that the proposed phasing ensures continuity of sports facility provision at the site to maintain existing sports use in consultation with the Sports Association, sports clubs, the respective National Governing Sports Bodies and Sport England”

It’s not clear why the third bullet makes provision for retained sports facilities at the site. If this is to allow re-provision of the tennis facilities with appropriate changing and car parking on site this may be acceptable. However, retention of a single football or rugby pitch with no changing for car parking is unlikely to be suitable.

In relation to para 4.27, whilst phased release of land may be acceptable, this needs to be carefully considered to maintain continuity of sports use of the pitches and associated facilities. Provision of pitches without adequate changing, car parking and other associated facilities is unlikely to be acceptable. Phasing should take into account the impact on the use of the sports pitches by the existing sports clubs so that they can maintain their fixture programme to meet their respective league requirements together with associated training needs. Phasing should therefore be agreed through consultation with the Sports Association, sports clubs, NGB’s and Sport England.

MDNDP6 – Housing off Longford Road

Sport England supports the inclusion of this housing allocation to provide improved accessibility to the proposed replacement playing field provision at Longford Turning, however as previously stated Sport England considers that it is not sufficient to link the implementation of the footway/cycleway to the release of this housing site, as there is no guarantee that the housing allocation will be implemented, or implemented at the right time to ensure that the new footpath is available when it is needed. Sport England considers that it would be unacceptable to release the Greenfields site for housing in advance of the footway/cycleway being implemented as this would result in a replacement playing field with insufficient accessibility for walking and cycling. Therefore, as previously set out the plan needs to ensure that the replacement cycleway/pathway is implemented prior to the

transfer of sporting activity from Greenfields to Longford to ensure that the footway/cycleway is available when it is required, with or without the housing allocation at Longford proceeding.

In respect of part 2 of the policy and para 4.32, Sport England has no objections in principle to the land being released to an appropriate body to deliver and maintain the sports facilities, providing this is demonstrated to meet the test of providing equivalent or better playing field facilities to those proposed to be developed for housing at Greenfields.

Policy MDNDP7 – Green Infrastructure Network

In so far as this policy relates to sports facilities including playing fields, there should be appropriate reference to the requirements of para 74 of the NPPF and Sport England’s policy to protect the existing provision unless:

- a robust up to date assessment has demonstrated the facility to be surplus to requirements; or
- the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision the needs for which outweigh the loss.

The wording of the policy should be amended to address the above.

Sport England has not been able to establish if the list of sites in para 4.38 is inclusive of all playing fields in Market Drayton including those on school sites? School playing fields should be subject to the same protection under this policy as other playing field sites as they form an important part of the supply of playing fields to meet local needs. The list of sites should therefore be revised accordingly to ensure that all existing playing fields are suitably protected by this policy.

Policy MDNDP10 - Land adjacent Market Drayton swimming pool

Sport England supports the policy to develop this site for multi-functional recreation, sports and cultural uses.

However, the plan is lacking a policy to support the development of other new built sports facilities or proposals to enhance existing built sports facilities in Market Drayton, such as those Market Drayton Swimming Centre itself and Grove School? A policy should be included to support development proposals that maintain and enhance existing built sports facilities in Market Drayton to meet local needs as this would align with the

	<p>existing adopted Indoor Sports Facilities Strategy, would be consistent with the overall vision and objectives to promote excellent sporting facilities as a means of promoting the health and well-being of local residents, and would be consistent with the guidance in the NPPF paras 70, 73 and 74.</p>
<p>5. Delivering the Plan</p>	
<p>Other Comments</p>	

5) Would you like to be notified of Shropshire Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the Market Drayton Neighbourhood Plan?

Yes No

Please note: Under the Local Government (Access to Information) Act any representation received by Shropshire Council on the Market Drayton Neighbourhood Plan Publication may be inspected by members of the public and cannot be treated in confidence. Comments and respondent's names will also be made available on the Council's website.

Thank you for completing this response form.