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Planning Policy
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VIA EMAIL

29135/A3/MAS/JB/ac

24th July 2018

Dear Sir / Madam,

REPRESENTATIONS TO THE MARKET DRAYTON DRAFT NEIGHBOURHOOD PLAN CONSULTATION

Barton Willmore LLP is instructed by Strategic Estates Ltd to provide representations to the Draft Version of the Market Drayton Neighbourhood Plan ('MDNP').

Our client supports Market Drayton Town Council in their production of the MDNP, but there are a number of concerns that we consider should be addressed in order to ensure that the MDNP meets the basic conditions; and to ensure that the town continues to grow in a sustainable manner whilst meeting the housing needs of existing and future residents. This is particularly important given the existing and future employment aspirations and the forthcoming Local Plan Review, both of which will have implications for housing supply within Market Drayton.

Policy MDNDP1 – Proposed Marina and Associated Tourism, Leisure and Related Development

Within this policy, point 5 indicates there will be housing development in the vicinity of the marina, yet there is no indication of overall number of dwellings proposed. In addition, transport and accessibility are outlined as potential constraints in terms of accommodating further development. It is difficult to plan for such improvements if the number of dwellings is not stated in the MDNP.

It is noted that the adjoining justification in Paragraph 4.6 describes the need for a mixed-use scheme to be in close proximity to the town in order to positively benefit its immediate surroundings economically. A marina, if achievable, would be an excellent addition to Market Drayton and could help to deliver significant regeneration benefits. Whilst housing could play a role in this, it is not however clear that there is sufficient evidence to demonstrate that the development is deliverable.



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Policy MDNDP4 – Land off Maer Lane

Similar to Policy MDNDP1 discussed above, there is no detail on the amount of residential development planned to take place at Land off Maer Lane. Point 4 within the Policy states “housing development will not be permitted in areas identified through a detailed flood risk assessment as flood risk zones 2 or 3”. It is unclear whether the draft Neighbourhood Plan, and therefore the choice of this site as a residential development location, has been supported by a Strategic Flood Risk Assessment.

Paragraph 157 of the National Planning Policy Framework (NPPF) states:

“All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) Applying the sequential test and then, if necessary, the exception test as set out below;*
- b) Safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and*
- d) Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.”*

This is particularly pertinent given the presence of Flood Zone 3 here and there is no mention of the potential impact on existing and future developments. Although a detailed flood risk assessment is yet to be carried out, it is fundamental to understand what impact the constraint will have on the overall housing numbers.

Policy MDNDP5 – Land at Greenfields

Similar to the other policies, MDNDP5 does not state the capacity of housing that this site could deliver. We also have concerns regarding the deliverability of this site with respect to the policy’s requirement for proposals to come forward on third party land, which is presumably outside of the promoter’s control.

Policy MDNDP6 – Housing Land off Longford Road

The policy is reliant on the outcome of Policy MDNDP3, which proposes formal and informal recreation space at Longford Turning. The policy text for MDNDP3 and its supporting text acknowledges that the relocation of the sports facilities will be challenging in terms of feasibility and timing given the need to align a number of interests.

As a result of this, the proposals for housing within Policy MDNDP6 are uncertain given the reliance on third party land. It is not clear what level of housing is proposed, nor is it clear what the expected phasing / timing of the development, or whether any housing could be delivered within the Plan period.

Conclusions

Whilst our client supports the Market Drayton Neighbourhood Plan, we consider there are significant shortcomings relating to the proposed housing allocations which undermine its ability to support the sustainable growth of the town. The policies noted above are not sufficiently detailed, nor are they

supported by evidence required to demonstrate that they can be considered suitable, available and deliverable locations for housing development. This provides uncertainty as to how much housing will be allocated and delivered over the Plan period, which will only serve to exacerbate the identified local issues of affordability and unbalanced housing mix. This is a significant concern given the forthcoming Local Plan Review, in which Shropshire Council currently set out a requirement to find sites for at least 641 dwellings, with some reliance on the Neighbourhood Plan to find sites. The Local Plan Review, and in turn the Neighbourhood Plan, are therefore intended to help address the existing housing supply issues and to support employment growth within the town.

To rectify this, and to ensure the Neighbourhood Plan meets the basic conditions, we consider that it should seek to maximise housing development on deliverable sites to significantly boost the supply and choice of housing, as required by the NPPF. To achieve this aim, alternative locations along the northern side of A53 should be explored in greater detail.

In addition to this, we consider it would be prudent to have a clear policy which commits the Plan to a formal review following the adoption of the Local Plan Review, to ensure it remains up-to-date.

We would welcome the opportunity to discuss these matters further and would be grateful if you could give consideration to our comments. If you have any queries regarding the above, please do not hesitate to contact myself or Mark Sitch.

Yours sincerely,

JAMES BONNER
Senior Planner

Enc.