

# **Market Drayton Neighbourhood Development Plan**

## **Schedules of Representations in response to Draft Plan, April 2017**

# Schedule 1: Community Representations and Response

(Most representations are presented in full. However, some of the longer ones have been summarised)

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representation <b>Market Drayton Town Council Consideration</b>	Proposed Change Number
C.1 C and P Wells	Policy S.M3	Objection	<p>We currently enjoy uninterrupted views across open fields and countryside to three sides of our property, the main reason we purchased it. This proposal would mean that we would be adversely affected by views of sports facilities, floodlighting etc. and that the public would have access to within 12 feet of our back door. We would also be affected by increased noise and pollution from traffic.</p> <p>The current lane which gives access to the proposed site is narrow with few passing places. Increases in pedestrians and/or cyclists give rise to more danger especially during winter months as the lane is not treated in icy conditions. Land to the south of the lane which is suggested for provision of walking or cycling would impact on the views to the front of our property. This land is somewhat elevated above the lane and would mean our privacy would be affected. The value of our property would also be adversely affected.</p>	See Change No 13
			<p><b>The area lies on the urban fringe of Market Drayton. Shropshire Local Plan (SAMDev Plan) policy S11 indicates that the Town's Development Strategy is to release housing land to the north on sustainable sites immediately adjacent to the development boundary. Recreational use is considered an appropriate alternative use and provide facilities that would meet the growing needs of the town both now and in the future. The allocation through policy S.M3 lies adjacent to the development boundary. Protection of residential amenity is a policy requirement and should ensure the layout of facilities, including the club house, parking and lighting, is considered appropriately to ensure there is no significant adverse effects upon this. An additional clause may however be included to provide a suitable buffer between the properties and any formal playing fields. Land covered by this policy would allow for improvements that would support walking and cycling, and would also enable passing provision to be made.</b></p>	
C.2 P and R Machin Abientot Art	Para 1.11	Support	<p>We are responding in support and to show the links of this 'community consultation', both as residents and in our role as voluntary Art Consultants for the Shropshire Arts &amp; Heritage Trail as developed by the MDCP &amp; the C&amp;RT</p> <p><b>Noted with thanks</b></p>	No change required
	Paras 2.2, 2.9, 2.11, 2.13	Comment	<p>The vision of culture &amp; leisure development and increasing access to these both in the town, by the canal and all their environs. The Shropshire Arts &amp; Heritage Trail intends to link the town and the canal using community art projects, in a series of phases. Phase 1 is under way with intended completion early 2017. Phase 1: GATEWAY PROJECT which is two art graphic boards on either side of the A53 bridge ~ Entering from NW called 'Doorway to Drayton', celebrating the town. ~ Exiting the town from SE called 'Shropshire Waters' celebrating the canal. This will develop the 'environmental corridor' of the Shropshire Union Canal in MD.</p> <p><b>Comments are helpful and the project will contribute towards attracting more visitors to the town centre from this direction.</b></p>	

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	Para 3.1	Comment	<p>The marina development could be a great boost to the town and linked by the second phase of the Art &amp; Heritage Trail which is proposed. Phase 2 SHROPPIE STONES These are small memory tile/slabs approx. 15 X20 cm laid in a continuous line leading the walker, cyclist, boater ...tourist to &amp; from the town. This is a largely self-financing project whereby community individual could pay a small price to have a family name set into an individual stone. See Gosport County Council project. With marina, financial incentive this could also lead to the marina and be a point of interest for all in and out of the area.</p> <p><b>Comments are helpful and the project may contribute towards attracting more visitors to the town centre from this direction. It would be useful to advise any developer of the marina and other associated users at such a time as any detailed proposal is advanced.</b></p>	No change required
	Para 4.6	Comment	<p>Integration and connectivity could be enhanced &amp; the Gateway graphic boards, Art &amp; Heritage Trail, plus Shroppie stones. The marina may well be prepared to contribute to the community art by commissioning further public art, community art events and ongoing involvement with the Trail as part of their commitment to the community 'Integration &amp; Connectivity'. This would bring commercial success to visitors both at the marina and into the town.</p> <p><b>It would be useful to advise any developer of the marina and other associated users at such a time as any detailed proposal is advanced about this project.</b></p>	
	Whole plan	Comment	<p>We are only two years' resident in Market Drayton &amp; running a small art business in France. We view the town as a pretty &amp; historically market town, but it could be a vibrant community inclusive town with this plan and the appliance of business knowledge and artistic engagement. Abientot Art is pleased to offer consultancy advice, of a voluntary nature, to support the above points in the draft MDNBD and community art.</p> <p><a href="http://www.abientot-art.com">www.abientot-art.com</a></p> <p><b>Noted with thanks</b></p>	
C.3 H Armytage	Whole Plan	Support	<p>I wish to express general approval of the policies in the Neighbourhood Plan, Public Consultation Draft, September 2016.</p> <p><b>Noted with thanks</b></p>	No change required
	Omission of matter	Recommend addition	<p>I have noted that reference to parking only occurs 4 times in the document. Reflecting on the clear benefits that the developments would bring to the town and the likely increase in visitor numbers, I wonder if some attention should be given to providing additional parking areas?</p> <p><b>Shropshire Council, which currently operates most of the public car parks within the town have not asked for any specific proposals for additional town centre car parking are included in the plan. No requests for public or customer parking by private companies. Market Drayton Town Council does not have the funds to make available further car parking. The current emphasis in relation to transport infrastructure is upon reducing the need to travel by car and this may influence the direction of future investment in walking, cycling and public transport.</b></p>	
C.4 P Virgo	Omission of matter	Recommend addition	<p>I think that the overall plan is excellent however there is a major gap in regards to transport. Market Drayton is an ideal town to develop a network of cycle paths and routes. The compact nature of the town and the fact</p>	No change proposed in

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			<p>that there is little elevation difference means that cycling could become more popular amongst residents. There are a number of existing cycleways around town but they do not yet form a cohesive network of routes. I believe that the plan needs to address this issue. There are many routes around town which could, at relatively low cost, be made more "bike friendly". Notably there are a number of one way roads which should be redesigned as two way for cyclists, this is a very cost effective solution.</p> <p>Key facts: Evidence from Belgium suggests that, compared to the road network, the risk of injury is lower in a one-way street with contra-flow cycling or at crossroads including such a street. Cycling UK View (formal statement of Cycling UK's policy): One-way systems put cyclists at a disadvantage, making their journeys longer and more stressful. Restoring two-way cycling on one-way streets can significantly improve the safety, convenience and attractiveness of cycling. Each local authority should review all its one-way streets, with the aim of progressively converting them either to two-way use (particularly for one-way systems on more major roads), or permitting contra-flow cycling (e.g. on narrower streets), unless it can be demonstrated that there are overriding hazards affecting cyclists. Contra-flow cycling should be facilitated through appropriate engineering treatments, depending on the traffic volumes, speeds and road widths involved. In many cases, e.g. on quieter roads, unsegregated two-way cycling on an unmarked road is an appropriate solution. More heavily trafficked one-way roads should be provided with contra-flow lanes. I believe that the plan needs a specific section on sustainable transport. I am very happy to speak with someone about this matter.</p> <p><b>The advice is noted with thanks and the importance of infrastructure to promote cycling and thereby reduce travelling by car is acknowledged. In addition, the suggestions about what each local authority should do are also helpful. The potential health benefits are also recognised. Market Drayton Town Council is not the Highway authority with responsibility for addressing transport issues such as this. However, it will bear in mind this advice should it be consulted by Shropshire Council upon revisions to the Core Strategy and any review of the Local Transport Plan</b></p>	relation to this suggestion
C.5 S Roberts	Para 4.7	Question	<p>Has the new marina in Audlem been taken into account in suggesting the Market Drayton one? Surely there will not be the business to sustain two so close together and as the Audlem one is in operation; will businesses move to Market Drayton?</p> <p><b>It is understood Audlem is a successful marina. The policy is an enabling one that has been advanced in accordance with Shropshire Local Plan policies which support such a measure. Interest has been shown by parties associated with the industry who believe this to be a viable proposal.</b></p>	No change proposed in relation to this representation
	Para 4.29	Question	<p>What safety considerations have been taken into account in suggesting a 'wildlife corridor' on old railway line being opened up as a foot/cycle path? The line runs mainly in a cutting therefore will need plenty of lighting, how will this be achieved without disrupting wildlife?</p> <p><b>Accessibility of green space is promoted by Natural England and matters of safety would be considered at the design stage. The foot and cycle links associated with Greenfields were highlighted in the SAMDev Plan and this plan sought to bring this forward. However, a further review suggests it is unlikely that this could be</b></p>	See changes 22, 24, 27 and 28.

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			<b>delivered in any meaningful way in view of other land ownerships. Hence, the policy has been amended to remove the foot/cycle links element but retaining the area as 'local green space' in view of its importance to biodiversity and provision of woodland.</b>	
	Para 4.37	Question	Where is Stafford Road in Market Drayton? I assume you mean Stafford Street but a mistake like this causes me to question the rest of the content of the document and suggests it has not been proof read by anyone from the Neighbourhood Plan Group - sorry to be picky but on such an important document, a mistake like this should have been picked up. <b>Grateful for pointing out this typographical error</b>	See changes Nos 25 and 26
	Omission of matter	Question	Having read the document, I can find no suggestion that with the new housing and therefore increased population, that there are plans to expand the doctors' surgery or increase school places. Doesn't the Community Infrastructure Levy (CIL) help to cover infrastructure including schools and hospitals? <b>The plan does not increase the housing requirements for the town and its surrounding area, which have already been set by Shropshire Council through its Local Plan. It will have consulted relevant partners upon its plan including those responsible for education and health. The Community Infrastructure Levy can be used to fund infrastructure such as schools. Shropshire Council maintains a LDF Implementation Plan that reviews annually the infrastructure priorities. In relation to local infrastructure it engages with local communities including through town and parish councils.</b>	No change proposed in relation to this representation
	Consultation arrangements	Comment	Having worked professionally with Parish Plan groups on Community Led Plans, I think this is an excellent opportunity for Market Drayton. I am a little concerned as to the low response rates to consultation in the past and the lack of information around events. It was by accident that I was aware of the consultation through being delivered a Drayton Messenger; I will now monitor the webpage for further consultation events and activities. Where are events advertised? I've not seen anything on social media such as Drayton Crier. <b>The Messenger has been specifically asked to assist with publicity for the plan so it is pleasing to see that this has been noted.</b>	No change required
C.6 S Sparrow	Policy S.M6 Para 4.10 to 4.34	Objection	Our land seems to be part of the local green space as indicated in area 10 and we have never been consulted upon this or informed about what was going on. <b>All the areas concerned were identified in the Community Led Town Plan. It is understood that the area concerned is outside of the designated neighbourhood plan area.</b>	No change required
C.7 Mr and Mrs R A Hughes	Policy S.M8 Para 4.39	Objection	The old railway cutting is currently a sanctuary for wildlife. It is currently totally enclosed so the wildlife remains undisturbed. We believe it should stay that way. If public access was created we believe it would be unsafe, become a route for motorbikes and a place where youth would gather. It would be very difficult to police and monitor. We do not believe it would help access into the town. There are already well lit footpaths along Prospect Road which provide for walking access. If the cutting was developed to provide a cycle/footpath it would require costly groundworks, purchase access and provide lighting to a very dark space. All these actions would have a detrimental effect on the wildlife you are aiming to protect. Leave it alone. <b>Accessibility of green space is promoted by Natural England and matters of safety would be considered at</b>	See changes 22, 24, 27 and 28.


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			the design stage. The foot and cycle links associated with this area were indicated in the SAMDev Plan and this plan sought to bring this forward. However, a further review suggests it is unlikely that this could be delivered in any meaningful way in view of other land ownerships. Hence, the policy has been amended to remove the foot/cycle links element but retaining the area as 'local green space' in view of its importance to biodiversity and provision of woodland.	
C.8 Mr and Mrs G M Forster	Policy S.M8	Qualified support	No objection to railway cutting being used for cycling and walking as long as the shrubs and trees are kept for wildlife.  A review of the policy suggests it is unlikely that the foot/cycle links could be delivered in any meaningful way in view of other land ownerships. Hence, the policy has been amended to remove the foot/cycle links element but retaining the area as 'local green space' in view of its importance to biodiversity and provision of woodland.	See changes 22, 24, 27 and 28.
C.9 G Bates	Policy S.M1	Qualified support	Support the development of the new marina, I think that the site of the old marina should be enhanced and a new use found for it.  Support welcome. In relation to the 'old marina', it is presumed this refers to the Market Drayton Canal Basin Conservation Area. No specific proposal is included in the plan for this area. Should resources become available, including through the mew marina proposal, to enhance this Conservation area, then such proposals would be welcome.	See Change No 10
	Policy S.M8	Qualified support	The wildlife corridor needs to be kept as ecologically friendly as possible – just natural flora and fauna with no human interference.  Accessibility of green space is promoted by Natural England and matters of safety would be considered at the design stage. The foot and cycle links associated with this area were indicated in the SAMDev Plan and this plan sought to bring this forward. However, a further review suggests it is unlikely that this could be delivered in any meaningful way in view of other land ownerships. Hence, the policy has been amended to remove the foot/cycle links element but retaining the area as 'local green space' in view of its importance to biodiversity and provision of woodland.	See changes 22, 24, 27 and 28.
	General	Comment	Please do not build on floodplains  There are no proposals for this in the plan. There are areas away from the floodplain that may also be at risk of flooding. Where proposals are advanced that might affect these a requirement is indicated to carry out the appropriate investigations to ensure this is considered appropriately within any proposal.	No change proposed in relation to this representation
C.10 D Sprigg	Policy S.M1	Comment	Marina will greatly enhance the opportunities provided by the canal. It would be a centre for canal users and enhance the trade in the town provided some means of transport is provided. However, the town centre needs developing more with more businesses coming, else the marina will become the centre. Workshop facilities on site would be excellent to if plans included a dry dock.  Welcome support for the marina. There is a requirement for any proposal involving retailing at the marina to undertake an impact assessment, as required by Shropshire Local Plan. The facilities for canal boats at the marina will be determined by any operator. The regeneration of the town centre is supported but with a	No change proposed in relation to this representation

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			policy for one area being presented as an example of what might be undertaken. Other measures depend upon landowners and owners of premises. There are policies in Shropshire Local plan that encourage these. The Town Council is not aware of any other current proposals but would be happy to try to assist should there be any. Those that may come forward during the plan period will be judged by policies in Shropshire Local Plan.	
C.11 McDyre and Co on behalf of M and J Whittingham	Map 1	Support	The proposed boundary shown by black-dashed line is supported particularly on the northern side of A53 since the Tern Valley severely limits development on the southern side of the town. <b>Noted</b>	No change required
	Paragraph 2.5	Comment	A reference is made in the paragraph to Policy MD3. It should be added here that adopted SAMDev Policy S11.1(3) states: - <i>“Further to MD3, the release of further greenfield land for housing will be focused in the north of the town on sustainable sites adjoining the development boundary, subject to suitable access.”</i>  The boundary referred to in S11.1(3) is clearly the current adopted plan boundary for Market Drayton and the re-drawing of the Neighbourhood Plan area boundary will facilitate development beyond it as envisaged by S11.1(3). <b>Additional housing provision to meet policy S11.1 was not one of the purposes agreed between the parties preparing the NDP and Shropshire Council has continued to advise that it is confident the housing allocations and windfall allowance for development within the current boundary should meet housing needs until 2026. Any additional housing land brought forward within this NDP is incidental to enabling other specific proposals to be brought forward.</b>	No change required
	Policy S.M4	Objection	The Plan should not rely on delivery of housing from these two particular sites, certainly within the early stages of the Plan period to 2026. Our clients’ site at Adderley Road, approx. 4.5 ha, is more easily developable and deliverable and its housing allocation will provide some certainty and continuity in delivering housing which the two sites at Maer Lane cannot in the earlier stages of the Neighbourhood Plan and the Shropshire Council Local Plan Partial Review. It should be considered a site that will be developed in the longer term. <b>The NDP needs to be read in association with Shropshire Local Plan and this is made plain within section 2 of the NDP. The allocation of these sites (S.M4) has been made with the knowledge of the owner who indicates it is available in association with other land. Its availability, either in the short or long term, should not affect any proposal on land elsewhere that meets the requirements of Shropshire Local Plan, particularly policy S11.1(3) which indicates the direction of growth in terms of housing development. Shropshire SAMDev Plan (December 2105) which sets out the approach to delivering the housing guideline 2006-2026 has been found sound and this does not depend upon the delivery of the sites advanced through this policy. It was adopted having been assessed against the housing provisions of the NPPF. Shropshire Council has commenced a review of its Core Strategy and issued a ‘call for sites’. This site might usefully be submitted through that process</b>	No change proposed in relation to this representation

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	Policy S.M5	Comment	<p>It is noted however from para. 4.26 that only 31% of people in Market Drayton supported the sale of the site. As with the two sites proposed at Maer Lane under S.M4 it would be unwise of the Town Council and Shropshire Council to rely on early delivery of this site and it should be programmed for the later stages of the Plan period. It should be considered a site that will be developed in the longer term.</p> <p><b>One third of residents wanted the Greenfields site to remain as a recreation area. The Greenfields site will, in the near future, be surrounded by new housing which will may potentially restrict its use because of complaint in terms of significant adverse effects on amenity from noise, use of the club house, parking and flood lighting.. There are no opportunities on the existing site to expand facilities to accommodate a growing population, increased demands and need for both formal and informal recreation. Public funding is not available to enhance facilities and the current subsidy is under pressure from many other directions. Relocation and housing development on the existing site provides an opportunity to provide enhanced facilities both in terms of area and accommodation. The area is referred to in the SAMDev Plan (Policy and this policy S11.1(2) and this NDP policy gives effect to it. It is not relied upon to meet Shropshire Council's housing requirements and the relevant Shropshire Local Plan housing policies provide flexibility for new housing within or adjacent to the town's development boundary to its north. (see SAMDev Plan Policy S11.1(3)). Shropshire SAMDev Plan (December 2105) which sets out the approach to delivering the housing guideline 2006-2026 has been found sound and this does not depend upon the delivery of the sites advanced through this policy. It was adopted having been assessed against the housing provisions of the NPPF.</b></p>	No change proposed in relation to this representation
	Propose new housing site and Policy	Recommend change	<p>Land at Adderley Road would remove uncertainty about the delivery of new housing land because of its deliverability and its sustainability. Local Plan allocation site MD030 which lies to the west of the Greenfields recreation area and south of A53 bypass, is currently under construction. The Adderley Road site would follow on ensuring continuity of new housing development to meet needs in Market Drayton. We estimate the site could deliver some 125 new homes in a variety of styles, including affordable homes and some bungalows over a 5-year build programme.</p> <p>Propose that a new policy be introduced to provide for the housing allocation of the Adderley Road land (see plan below). The Adderley Road site comprises two fields bordered by tree and native hedgerow. The site has a long frontage to Adderley Road on its eastern boundary and lies a short distance from the A53 Market Drayton / Adderley Road roundabout to the south. A residential property, Westways and a small paddock, lie between the site and the A53 Market Drayton bypass.</p> <p>Proposed new policy:</p> <p><b>Policy S.M10 – Land adjacent to Adderley Road</b></p>	No change proposed in relation to this representation



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			<p>Approximately 4.5 ha of land adjoining the west side of Adderley Road may be developed for housing and phased at an early stage in the Plan period. Development of the site would contribute to the housing requirement for Market Drayton and also complement the expanding Sych Farm Business Park lying immediately to the east as a mixed-use housing / employment location. The housing development should be undertaken in accordance with the following criteria: -</p> <ol style="list-style-type: none"> <li>1. The vehicular access to the site will be taken from Adderley Road.</li> <li>2. Design matters should conform with SAMDev Policy MD.2.</li> <li>3. Provision of a signal controlled pedestrian crossing point to the western arm of the A53 / Adderley Road roundabout.</li> <li>4. Provision of the type and affordability of housing in accordance with Core Strategy Policy CS11.</li> <li>5. Provision of an on-site children's play area.</li> </ol> <p>Supporting submission and evidence included in the representation includes:</p> <ol style="list-style-type: none"> <li>1. The site was identified in the past as employment land but the current SAMDev proposal is sufficient for Market Drayton.</li> <li>2. It is acknowledged that future growth should be to the north and although in the examination of the SAMDev the Inspector considered the proposals in that plan sufficient it was indicated a partial review should get underway as soon as possible. A representation will be made to include the site within that review.</li> <li>3. Site investigations have established its suitability for housing including Topographical Survey, an Ecological Appraisal, a Transport and Access Review, a Geo-environmental Survey and a Drainage and Services Study.</li> <li>4. Advice is given about how the site meets the economic, social and environmental roles for sustainable development.</li> <li>5. The accessibility of the site to jobs and service, through a range of sustainable means is described.</li> <li>6. The site is considered to be deliverable with interest being shown in it by a major house builder.</li> </ol>	

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			 <p data-bbox="748 959 1839 1184">The remit of this plan did not include allocating further sites to meet the Shropshire Local Plan housing guideline figure because the SAMDev Plan covers this fully. Further sites, should they be needed to meet any new housing target, will be considered for housing through SAMDev Policy S11.1 or the review of Shropshire Local Plan Core Strategy which has just commenced. It has been found sound and that finding did not rely upon the preparation of a neighbourhood plan for Market Drayton and its allocation of further land for housing. The NDP does not seek to restrict land for housing within or adjacent to Market Drayton to a greater extent than Shropshire Local Plan. The agent/owner should seek planning permission based upon meeting the requirements of SAMDev Policy S11.1(3).</p>	
C.12 Mr and Mrs M Weddle	Paragraph 4.19	Question and comment	<p data-bbox="748 1193 1832 1278">What does a quiet lane mean? Access to the area will generally be by car as this is an out of town site. Question whether cycling is practical with the equipment such as sports bags that will be carried. If successful, this will put more traffic on the narrow lane without any alterations.</p> <p data-bbox="748 1283 1832 1391">A 'Quiet Lane' is a nationally recognised designation, often hosted by a local, rural community, such as a parish or village group, who recognise that Quiet Lane designation can bring benefit to their local quality of life. They are designated minor rural roads intended to pay special attention to the needs of walkers, cyclists, horse riders and the mobility impaired. They are designed to enable users to enjoy country lanes in</p>	No change proposed in relation to this representation

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			<p>greater safety and encourage car drivers to respect more vulnerable road users. They encourage local journeys to be made on foot or bicycle, and for recreation. While cars are not banned and use of these roads is shared, lower speed limits and discrete road signs can encourage drivers to slow down and help people to appreciate the beauty and tranquillity of country lanes. By helping to protect the character and tranquillity of the countryside from traffic, reducing the intimidating effects of traffic on rural roads, building community links and encouraging healthy, recreational activities, Quiet Lanes play a valuable role in improving people's quality of life. (NB description taken from CPRE's guide to Quiet Lanes – September 2006). There are regulations covering these which must be met and consequently it is not a specific proposal but investigated.</p> <p>Land covered by this policy would allow for improvements that would support walking and cycling, and would also enable passing provision to be made.</p>	
	Paragraph 4.20	Objection	<p>The current premises for Market Drayton FC are ideally located for its purposes within the centre of the town and easily accessible by car, cycling and walking with younger people in particular able to get to the ground safely. The Club is bound by Football Association Rules. Relocation will jeopardise its future. Many volunteers work tirelessly for the Club and its location plays a part in enabling this.</p> <p>There is a need for public playing fields to serve the whole community and currently the area is not able to do this. The pressures, both in terms of the need for further facilities and effect on residential amenity, are increasing while resources diminishing. Relocation offers the opportunity to expand and enhance facilities to provide sports for all.</p>	No change proposed in relation to this representation
C.13 Gillian Wilde	Policy S.M5 and paragraph 4.29	Objection	<p>The land has become a natural habitat over the years and turning it into a footpath/cycle link will destroy this. The area should be kept as it is.</p> <p>Accessibility of green space is promoted by Natural England and matters of safety would be considered at the design stage. The foot and cycle links associated with this area were indicated in the SAMDev Plan and this plan sought to bring this forward. However, a further review suggests it is unlikely that this could be delivered in any meaningful way in view of other land ownerships. Hence, the policy has been amended to remove the foot/cycle links element but retaining the area as 'local green space' in view of its importance to biodiversity and provision of woodland.</p>	See changes 22, 24, 27 and 28.
	Policy S.M8 and paragraph 4.39	Objection	<p>Who will maintain this land and will the owner make it available to be turned into a foot/cycle link? Safety measures will be required as it sits between two ridges being potentially dangerous. It will not afford direct access to the town as related land has been purchased. There is no value in disturbing it.</p> <p>It is understood that the owner was interested in promoting the area for this purpose. However, see above.</p>	See changes 22, 24, 27 and 28.
C.14 P M Boffey	Paragraphs 4.37 and 4.38	Objection	<p>If made available for walking and cycling fear it will be used for motorcycles and anti-social behaviour at night.</p> <p>Accessibility of green space is promoted by Natural England and matters of safety would be considered at the design stage. The foot and cycle links associated with this area were indicated in the SAMDev Plan and this plan sought to bring this forward. However, a further review suggests it is unlikely that this could be</p>	See changes 22, 24, 27 and 28.

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C.15 Grant Wilde	Policy S.M5 and paragraph 4.29	Objection	Area already a wildlife haven and public access will do nothing to enhance it. Lighting will be required for it to be used as a footpath/cycle link and would add to light pollution. <b>Accessibility of green space is promoted by Natural England and matters of safety would be considered at the design stage. The foot and cycle links associated with this area were indicated in the SAMDev Plan and this plan sought to bring this forward. However, a further review suggests it is unlikely that this could be delivered in any meaningful way in view of other land ownerships. Hence, the policy has been amended to remove the foot/cycle links element but retaining the area as 'local green space' in view of its importance to biodiversity and provision of woodland.</b>	See changes 22, 24, 27 and 28.
	Policy S.M8 and paragraph 4.39	Objection	Who will pay for the work and maintenance for it to be accessible? It will give rear access to our property and affect security. It will be used for anti-social behaviour and fly-tipping. <b>It is understood that the owner was interested in promoting the area for this purpose. However, see above.</b>	
C.16 R G Mellor	Whole Plan	Comment	Format and accessibility of document disenfranchises certain members of the community. Plan is incoherent and has no executive summary or conclusions. Its length will mean people will not take the time to read it. The document should be made more user friendly. <b>These concerns are recognised and unfortunate. However, the plan follows a format consistent for a Neighbourhood Plan. It is not a report but a document setting out policies covering various topics together with evidence/justification. It needs to be sufficient to meet semi-judicial purposes.</b>	No change proposed in relation to this representation
	Paragraph 1.3	Comment	Survey response of 5% renders it meaningless. Statistically the results are meaningless and should not be relied upon. Question the legitimacy of the results. <b>Although the residents' survey is important, it is just one factor to be considered in drafting the plan. Efforts were made to obtain a higher response and it is unfortunate that such a low level of response was received.</b>	
	Paragraph 1.8	Comment	The town does not lie on the Shropshire Union Canal which lies to the far east of the town boundary and borders few properties. It has no parking for visitors and locals and is more than a mile away for many residents. There has been poor planning over the past 50 years which the plan is seeking to correct but is doomed to failure. <b>In terms of proximity the Shropshire Union Canal lies adjacent to the town and within reasonable walking distance of its centre. For the purposes of description at a county or regional level, which one that the canal's location would be looked at, there is nothing wrong in saying the town lies on the canal.</b>	No change proposed in relation to this representation
	Paragraph 1.9	Comment	There is no bowls facility at Greenfields. It fails to mention the MENS Shed facility at Greenfields and how this is to be provided in any move. Reference to an 'All weather' facility at the Grove School is misleading. It is a tarmac playground marked out for tennis with no public access or us. The document seems to 'beef up' the shockingly poor facilities available in the town. <b>It is agreed that the reference to bowls is incorrect but the town does have a green and club. A reference</b>	

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			can be made to the MENS Shed facility although the Town Council is not formally aware that its property of that of Shropshire Council is used for this purpose. Should a formal approach the Town Council would be willing to consider how it might be incorporated into any relocation proposal. The sports currently using Greenfields are described in paragraph 4.16. There is no intention to suggest facilities are better than they are and in fact the issue that the plan seeks to address is to improve provision so far as it is considered possible.	
	Paragraph 1.10	Comment	There is no mandate from the residents' survey. Should the plan proceed to referendum there is a danger of manipulating the ballot in the event of a low turn-out. <b>Although the residents' survey is important, it is just one factor to be considered in drafting the plan. Efforts were made to obtain a higher response and it is unfortunate that such a low level of response was received. The referendum is a key element in the process which the Town Council is aware of. However, it has sought to involve the whole community in the process and will continue to do this.</b>	No change proposed in relation to this representation
	Paragraph 1.11	Comment	There was a majority in favour of retaining the sports facilities at Greenfields which has been ignored <b>The residents' survey results were recognised and important but a range of considerations have had to be considered to provide modern facilities and promote active lifestyles for all, including in informal activities. This can't be done with the resources currently available on the current land at Greenfields.</b>	No change proposed in relation to this representation
	Paragraph 2.8	Comment	Policy MD8 requires any canal facilities to be located within or close to settlements. Victoria Wharf is at the far extremity of the town. It is neither close nor within. <b>This is a matter of opinion. The marina site is within reasonable walking distance of the town centre.</b>	No change proposed in relation to this representation
	Paragraph 2.9	Comment	Policy CS15 requires any leisure facility over 300sqm and more than 300m from the town centre to have an Impact Statement. The football club has over 3,000 visitors per season and any move to Longford Turning would mean visitors do not go into the town centre. <b>Policy CS15 is referenced in SAMDev Policy MD10b in this regard. It is understood that reference to 'leisure facilities' in this instance are those that would normally be in town centre locations such as cinemas, and where out-of-centre locations would have a potential adverse effect on those centres. It would not apply to outdoor recreation facilities.</b>	No change proposed in relation to this representation
	Paragraph 3.6	Comment	The marina will not develop tourism. The town already has a marina. Canal use has peaked and has a natural capacity. The plans are 10 years behind those for Audlem Ellesmere. It will do nothing for the town because it is too far out with users have stocked up at Audlem Ellesmere where the shops are more convenient. The marina is doomed from the outset. <b>It is understood Audlem is a successful marina. The current wharf does not provide modern marina facilities. The policy is an enabling one that has been advanced in accordance with Shropshire Local Plan policies which support such a measure. Interest has been shown by parties associated with the industry who believe this to be a viable proposal. The proximity issue is addressed under representation to paragraph 1.8 above.</b>	No change proposed in relation to this representation
	Paragraph 3.6	Comment	There is no business case for uprooting the sports facilities at Greenfields. There is no reason why the existing	No change

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			<p>facilities cannot be enhanced.</p> <p><b>The facilities will be surrounded by new housing which may potentially restrict use because of complaint. There are no opportunities to expand facilities to accommodate a growing population and increased demands and need for both formal and informal recreation. Public funding is not available to enhance facilities and the current subsidy is under pressure from many other directions. Relocation provides an opportunity to provide enhanced facilities both in terms of area and accommodation, and promote sports for all.</b></p>	proposed in relation to this representation
	Paragraph 4.5	Comment	<p>Why provide a canal side public house when the Talbot is closed and up for sale? This is an ill-conceived idea not has no justification or merit and doomed to fail</p> <p><b>The policy is an enabling one that would allow such a facility to be provided in that location should this be a benefit to the overall scheme that will have far wider benefits.</b></p>	No change proposed in relation to this representation
	Paragraph 4.7	Comment	<p>The canal is not in close proximity to the centre of town and is not less than 1km. It is 1 km. The town's population is centred to the west of the town centre.</p> <p><b>See response to paragraph 1.8 above</b></p>	No change proposed in relation to this representation
	Paragraph 4.16	Comment	<p>The statement that the clubs using the Greenfields playing field support the need to relocate is incorrect and untrue. Any funds available to support the move and its upkeep are available now. Any additional costs to clubs as a consequence of the move would have to be funded by that move. 75% of local supporters walk to the ground. Longford Turning is not within reasonable walking distance and this would have a huge effect on supported attendance. The transport links to Longford are not supported at all for the 20 or so evening games per season. There is no mention of the community led sports hall or astro-turf pitch included in the Community-Led Town Plan of which 92% and 85% respectively supported. 57% said they are interested in Greenfields being used for housing in exchange for a new indoor and outdoor sports centre with recreation area elsewhere in another town location. There is no justification for the statement that current facilities are limited, inadequate for current and future needs with no capacity for their improvement. This is groundless and inaccurate.</p> <p><b>There is a need for public playing fields to serve the whole community and currently the area is not able to do this. The number of clubs using the facilities has reduced in that it has not been possible to accommodate other clubs because of the growth of those already using the facilities. The pressures, both in terms of the need for further facilities and effect on residential amenity, are increasing while resources diminishing. The proposal to relocate facilities will only take place if the current playing fields are replaced and associated facilities to enable their use provided. In addition, it is proposed that the new facilities will be better than those currently available at Greenfields and ensure higher standards for all current groups and promote greater participation and wider recreational activities for the health and wellbeing of the whole community. The Greenfields recreation- area is a public facility with lease arrangement between the Town Council and the Market Drayton Sports Association, to whom the Town Council also gives financial support. There are no</b></p>	No change proposed in relation to this representation

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			lease arrangements with Market Drayton FC. Market Drayton Sports Association, upon which the football club is represented, and with whom the Town Council have the lease agreement, were consulted and indicated support for the proposal. Inspection undertaken on several match days suggest the extent of local support from people walking to the ground is overstated. The proposed new site is within easy walking distance of a significant proportion of town residents and in an area, that may well expand because of anticipated housing growth	
	Paragraph 4.16	Comment	If there is a problem with facilities for Rugby, then move that and use the space to provide extra facilities for the other sports users and Men's SHED.  The Plan looks at how the Town Council might provide for a range of sports. The policy seeks to address a range of shortcomings and this includes changing facilities for other sports currently with sub-standard facilities at Greenfields.	No change proposed in relation to this representation
	Paragraph 4.18	Comment	Having stated the site is the only one available its price will now increase.  As with all matter of land acquisition this is a matter for negotiation and there are many elements that must be considered.	No change proposed in relation to this representation
	Paragraph 4.19	Comment	The location of the sports fields will positively discourage walking to Longford Turning. Only one third of the town's population is within 1 mile radius. Greenfields covers nearly all of the town's population within 1 mile. Would doubt anyone would walk to Longford Turning unless they were one of the third who live within 1 mile.  The policy seeks to provide facilities to serve the whole community comprising both the town and its immediate surrounding area and not just one club. The facilities available for this are limited on the current site and do not address the health and welfare benefits through promoting formal and informal recreation for the whole community. There is insufficient space to cater for all the football needs of the town, with some potential clubs having had to seek alternative facilities elsewhere because of the needs of the two football clubs currently using the ground. It is in an area that the SAMDev Plan(S11.1(3) indicates is likely to form the extension of the town (i.e. to the north of the town). The site is on the edge of the current built-up area and within walking distance. The walking distance to the proposed site at Longford is potentially less and certainly no greater than that at Greenfields for many of the town's residents in that access to the latter is not direct.	No change proposed in relation to this representation
	Paragraph 4.20	Comment	The Messenger said that all of the proceeds from the sale of the land at Greenfields would be used to provide new sports facilities. There are mixed messages in the plan. The guarantees given in the Messenger should be given.  The NDP's policies in relation to this matter are clear and form planning purposes. The Sports Council has supported the proposal based on the policies in the plan and it is understood its approach to any planning application would require no loss of playing fields.	No change proposed in relation to this representation
	Paragraph 4.21 and 4.25	Comment	There has been no consultation with the clubs at Greenfields regarding a phased approach and whether this is possible yet this now appears to be central plank of the Neighbourhood plan. In the case of the football club, a	No change proposed in



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			<p>move would have to be seamless due to the strict FA rules in place regarding ground criteria. There can be no games in temporary substandard locations.</p> <p><b>The policy makes it clear that the proposal to relocate facilities will only take place if the current playing fields are replaced and associated facilities to enable their use provided. Consultation has been undertaken with Market Drayton Sports Association upon which it is understood the football club is represented.</b></p>	relation to this representation
	Paragraphs 4.22 and 4.26	Comment	<p>There is no long-term community aspiration for the relocation of Greenfields Sports Facility. Residents are apathetic regarding sports facilities in the town and the Messenger said that</p> <p><b>The possible relocation of the Greenfields recreation area has been an issue for several years and it is becoming increasingly important that the matter be addressed as described under the representation to paragraph 3.6 above.</b></p>	No change proposed in relation to this representation
	Paragraph 4.26		<p>The recent National Referendum described a 2-3% majority in favour of “leave” is as a clear and overwhelming mandate yet in this instance a 3% majority against a Greenfields move is described as “roughly equal”.</p> <p>How will the council demonstrate that “all proceeds “arising from the sale from the sale of Greenfields will be invested in the new facilities.</p> <p><b>The statistics are presented for all to see. In relation to the NDP the requirement is to ensure replacements facilities are brought forward for the land to be released for housing.</b></p>	No change proposed in relation to this representation
	Paragraph 4.27		<p>There is no Stafford Road in Market Drayton?</p> <p><b>Grateful for pointing out this typographical error</b></p>	See changes Nos 25 and 26.
C.17 R Thomas	Policy S.M8 and paragraph 4.39	Comment and questions	<p>The former railway line is not in one ownership so question the comment about the owner wishing to actively pursue the area as a wildlife area. Is it intended that the Council should own this? Public access and wildlife friendly are incompatible. Lighting needed for walkers would deter wildlife. Will provision be made for security and safety of users, residents and wildlife? It is not clear where the path would lead to and how it will link to other amenities? The area will need regular maintenance and supervision. Who will be responsible for and fund this? Will other agencies such as Shropshire Wildlife Trust be involved in its planning and maintenance? Support the area being a wildlife corridor.</p> <p><b>The foot and cycle links associated with this area were indicated in the SAMDev Plan and this plan sought to bring this forward. It was understood that the area shown as covered by this proposal was in one ownership, although further investigations suggest that a meaningful link cannot be achieved without other land being made available and this is not certain. If the proposal was to proceed, arrangements would have to be agreed between the County and Town Councils to ensure any foot/cycle link was maintained, as with any footpath/cycleway. However, the policy has been amended to remove the foot/cycle links element because it is unlikely to be achievable. The area will however be retained as ‘local green space’ in view of its importance to biodiversity and provision of woodland.</b></p>	See changes 22, 24, 27 and 28.
C.18 Westwood	Paragraph 2.2	Comment	Your plan comments as the town would be a main service centre for the area re-education leisure and healthcare. How will this work effectively given the new housing proposed when the schools are already at	No change proposed in



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			<p>capacity, the health centre stretched you have to wait weeks for your own doctor, the diabetic clinic is not running at present which is a major concern for the health of the town and the nation as a whole. At present the population of Market Drayton is an aging one and a very young one. Young adults move away for greater economic and leisure opportunities. What is being done to address this in the town, the youth centre is gone as residents didn't like it being where it was even though it has been there when the Lower Grove was there, and anyone moving onto the estate would have been aware it was there. Shropshire Council has approached yourselves about the possibility of the town council assisting in the running of the library and swimming pool (as in other Shropshire towns). Without the library there would be no access to free help, information and resources which are vital to people's lives, as well as being an integral part of the community, and in the case of the swimming pool the impact that this would have the leisure/health of the town. It is to be hoped that these factors have been considered, and that you will be working with the local health, education and leisure continue and even expand for the benefit of everyone.</p> <p><b>The NDP can only address matters related to land use and spatial planning. It is not a document that addresses wider issues although tries to take these into account in so far as they may affect change of use of land. Housing proposals and the guideline figure for growth have been advanced by Shropshire Council and consultation with the providers of services will have been consulted and their responses considered, including, where necessary, through a public examination. Economic development is proposed through Shropshire Local Plan and this plan seeks to improve recreation facilities through policies S.M3 and S.M5. The pressures upon public expenditure are significant in terms of what is being asked of Market Drayton Town Council and the approach being pursued is aimed at enabling improvements to recreational leisure facilities, including considering the anticipated population growth.</b></p>	relation to this representation
	Paragraph 2.11	Comment	<p>Transport links need to be radically assessed. Travel on the bus is very limited which prevents non-driving people from accessing other places for leisure, education, culture and health</p> <p><b>Shropshire Council is responsible for transport planning and has been consulted upon this NDP. Increasing viability thresholds are recognised and this may be compensated for through population growth arising from new housing. This is not a matter that the NDP can influence directly.</b></p>	No change proposed in relation to this representation
	Paragraph 3.6	Comment	<p>With regards to sustaining and developing the local economy you plan to develop a marina and tourism. To develop the town as a tourist destination, how will you attract new businesses, both local and high street chains. When you look at the town it has been dying since the 1990s due to recessions and town being a "dormer town" with people shopping accessing cinema etc. where they were working rather than the town being invested in. What is being done to ensure the town is attractive to new businesses, when many of the buildings are owned by private landlords who charge exorbitant rents. The ability to buy new clothes and new shoes is very limited and these are essential everyday items.</p> <p><b>The NDP can only address matters related to land use and spatial planning. It is not a document that addresses wider issues although tries to take these into account in so far as they may affect change of use of land. Identifying land and policies for housing development and promoting employment land and measures</b></p>	No change proposed in relation to this representation

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			such as a new marina through Shropshire Local Plan and the NDP will support other non-land use planning measures by relevant public authorities and organisations such as Shropshire Council and the Marches Local Enterprise Partnership.	
	Public Toilets	Comment	The public toilets need addressing urgently. the signage is appalling with strangers to the town wandering in circles looking for the toilets and having to ask strangers, shops and businesses where they should go only to be told they are closed and vandalised. <b>This is not a matter for the NDP.</b>	No change proposed in relation to this representation
C.19 C Kenworthy	Policy S.M3	Objection	This will devalue my house through noise, lighting and loss of natural countryside views that will result from the development. If it goes ahead compensation will be expected. <b>The area lies on the urban fringe of Market Drayton. Shropshire Local Plan (SAMDev Plan) policy S11 indicates that the Town's Development Strategy is to release housing land to the north on sustainable sites immediately adjacent to the development boundary. Recreational use is considered an appropriate alternative use and provides facilities that would meet the growing needs of the town both now and in the future. The allocation through policy S.M3 lies adjacent to the development boundary. The policy requires the layout of facilities supporting the recreational use should protect residential amenity. An additional clause may however be included to provide a suitable buffer between the properties and any formal playing fields. Legislation covers when and where compensation should be paid.</b>	See change No 13.
C.20 R Agnew on behalf of Gladman Development Ltd	Housing sites	Change recommended	Planning Practice Guidance stresses the importance of considering housing reserve sites, and providing indicative delivery timetables to ensure that emerging evidence of housing needs is addressed to help minimise any potential conflicts that can arise and are not overridden by a new Local Plan. Additional measures to take into account in a neighbourhood plan where the evidence base for the plan policy is likely to become less robust is that where it is intended to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the anticipated timescales in this regard. <b>This is covered by NDP paragraph 5.3</b>	No change proposed in relation to this representation
	Whole Plan	Comment	Shropshire Council is currently undertaking a review of its Core Strategy to ensure that the plan complies with the NPPF and so that the full Objectively Assessed Needs (OAN) for housing in Shropshire is being met. In this regard, the MDNP needs to be flexible so that should the strategic policies for Market Drayton change following the Core Strategy review it is still in accordance with them. Failure to do so would mean such policies included in the plan would be superseded by s38(5) of the Planning and Compulsory Purchase Act states: 'If to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be). The Core Strategy review is still in its infancy so the neighbourhood plan should ensure that MDNP can contribute to the delivery of sustainable growth throughout the plan period.	No change proposed in relation to this representation

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			<p>Shropshire Local Plan, in particular the SAMDev Policy S11.1(3), provides flexibility by enabling housing adjacent to the current development boundary. Such a policy in the NDP would only duplicate this. The strategy to be adopted in the review of Shropshire Local Plan has yet to be determined and should not be pre-empted. At such a time as it is determined a review of the NDP may take place as indicated by paragraph 5.3. Shropshire SAMDev Plan (December 2105) which sets out the approach to delivering the housing guideline 2006-2026 has been found sound and this does not depend upon the delivery of the sites advanced through this plan. It was adopted having been assessed against the housing provisions of the NPPF.</p>	
	Plan period	Recommend change	<p>The current proposed plan duration for the MDNP is from 2016-2026. Once reviewed the Core Strategy will cover the period from 2016 – 2036. It is recommended that the plan period of the MDNP be altered to reflect the approach going forward with the emerging Local Plan.</p> <p><b>The current Shropshire Local Plan covers the period until 2026. Shropshire Council has advised that the NDP should not go beyond the current end date as it would not then conform with the relevant Regulations.</b></p>	No change proposed in relation to this representation
	Housing policy	Recommend change	<p>Following the Shropshire Core Strategy Review, Market Drayton may need to accommodate more growth to assist the Council in delivering its full OAN for housing. Residential sites should be judged on the basis of their individual merits and whether they offer sustainable development. Currently the plan lacks clarity on what development would be considered in addition to sites already allocated. The Plan allows for development to be considered adjacent to the settlement boundary to the north of Market Drayton, however there is no reference of elsewhere adjacent to/outside the settlement boundary. Without clarification within the plan this could lead to inconsistencies in the decision-making process. By only allowing development to the north of Market Drayton, this would amount to a blanket approach to restricting housing development in a manner that is strictly prohibited by the PPG. To ensure the plan is considered flexible and is not superseded by the reviewed Core Strategy the following policy is proposed on a general stance towards housing development and to ensure that sustainable growth opportunities are considered on their sustainability credentials consistent with the requirements of the presumption in favour of sustainable development:</p> <p><b><i>When considering development proposals, the Market Drayton Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Market Drayton Neighbourhood Plan will be supported particularly where:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Providing new homes including market and affordable housing; or</i></b></li> <li>• <b><i>Opportunities for new business facilities through new or expanded premises; or</i></b></li> <li>• <b><i>Infrastructure to ensure the continued vitality and viability of Market Drayton.</i></b></li> </ul> <p><b><i>Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.'</i></b></p>	No change proposed in relation to this representation

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			<b>This is already covered by SAMDev Plan Policy S11.1 and this NDP acknowledges and supports this. Shropshire SAMDev Plan (December 2105) which sets out the approach to delivering the housing guideline 2006-2026 has been found sound and this does not depend upon the delivery of the sites advanced through this plan. It was adopted having been assessed against the housing provisions of the NPPF.</b>	
	Additional Housing Sites	Recommend change	<p>No specific comments are offered on the additional housing sites included however it is noted that these are the sites contained in the SAMDev documents and no new sites have been suggested. SAMDev states 'It is not the intention to identify every single site for development over the next 15-20 years, as criteria-based policies within the Core Strategy and SAMDev would provide a framework for additional sites to come forward.' It is recommended that more sites should be identified to be included in the plan at this stage.</p> <p>Up-to-date housing needs is relevant to the question of whether a housing land supply policy contributes to the achievement of sustainable development. As such, the emerging MDNP is progressing at the point in time where the full OAN for the wider authority area is unknown. Accordingly, the MDNP should seek to identify additional housing reserve sites to minimise potential conflict with the emerging Local Plan review.</p> <p><b>The NDP has accepted Shropshire Local Plan housing policies and proposals and does not seek to duplicate these. They are shown in this plan to indicate they have been considered in drafting policies for important local matters. Three more sites are identified within the NDP. SAMDev Plan Policy S.11.1(3) enables development to come forward to meet the housing guideline elsewhere. The strategy and content impending Local Plan review has yet to be determined and will consider OAN for the new plan period. Shropshire SAMDev Plan (December 2105) which sets out the approach to delivering the housing guideline 2006-2026 has been found sound and this does not depend upon the delivery of the sites advanced through this plan. It was adopted having been assessed against the housing provisions of the NPPF.</b></p>	No change proposed in relation to this representation
	Policy S.M6	Support but recommend change	<p>Whilst supporting the principle of this policy, the majority of this relates to the protection of existing Green Infrastructure networks without any evidence to demonstrate the importance of the wider Green Infrastructure network and why these areas should be protected. Development can often come forward in locations which will act to enhance existing Green Infrastructure. This policy needs to recognise the need that there may be circumstances where the loss of existing green infrastructure is required to enable the delivery of a development proposal that will enhance the wider green infrastructure networks i.e. through landscape buffers, additional tree planting etc. to the benefit of existing and future residents.</p> <p><b>The areas of local green space have been identified by the community within its Community Led Town Plan. The importance of the areas identified have been described although it is acknowledged that this needs to be set out more clearly. They are important and it is difficult to see where their loss would deliver development proposals. Should there be rare occasions where this might be the case then Section 38(6) of the Planning and Compulsory Purchase Act 2004 could be used, provided compensatory measures are advanced.</b></p>	See changes Nos 22
	Whole Plan	Comment	There is concern that the plan in its current form does not fully comply with basic conditions as the plan needs to further clarify its stance towards to development. The suggested modifications are considered necessary for	No change proposed in

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			the Plan to meet the basic conditions. <b>The approach adopted is considered to meet the requirements of Shropshire Local Plan, especially the SAMDev Plan, which has been found sound with the NPPF. Complying with Shropshire Local Plan will ensure this neighbourhood plan meets the basic conditions.</b>	relation to this representation
C.21 Market Drayton FC	Whole Plan	Comment	Format and accessibility of document disenfranchises certain members of the community. Plan is incoherent and has no executive summary or conclusions. Its length will mean people will not take the time to read it. The document should be made more user friendly. The SEA is intended to be read in conjunction with the Neighbourhood Plan draft – yet the Town Council have failed to publish this on its website and the document only appears on the Shropshire Council website. As stated below the SEA contains important comments regarding the location of the proposed Longford Turning i.e. <i>the area is not as central to the town as the current site.</i>	No change proposed in relation to this representation
			<b>These concerns are recognised and unfortunate. However, the plan follows a format consistent for a Neighbourhood Plan. It is not a report but a document setting out policies covering various topics together with evidence/justification. It needs to be sufficient to meet semi-judicial purposes.</b>	
	Paragraph 1.3	Comment	Survey response of less than 5% renders it meaningless. Statistically the results are meaningless and should not be relied upon. Question the legitimacy of the results. There was a high response rate from over 45's which the Council sought to redress by surveying under 18s. Over 32% of residents are in the range 18 to 45 and a further consultation of people within this age range should be undertaken to equalise out the level of response. <b>Although the residents' survey is important, it is just one factor to be considered in drafting the plan. Efforts were made to obtain a higher response and it is unfortunate that such a low level of response was received.</b>	No change proposed in relation to this representation
Paragraph 1.9	Comment	There is no bowls facility at Greenfields. It fails to mention the MENS Shed facility at Greenfields and how this is to be provided in any move. Reference to an 'All weather' facility at the Grove School is misleading. It is a tarmac playground marked out for tennis with no public access or us. The document seems to 'beef up' the shockingly poor facilities available in the town. <b>It is agreed that the reference to bowls is incorrect but the town does have a green and club. A reference can be made to the MENS Shed facility although the Town Council is not formally aware that its property of that of Shropshire Council is used for this purpose. Should a formal approach the Town Council would be willing to consider how it might be incorporated into any relocation proposal. The sports currently using Greenfields are described in paragraph 4.16. There is no intention to suggest facilities are better than they are and in fact the issue that the plan seeks to address is to improve provision so far as it is considered possible.</b>	See changes Nos 5 and 14	
				Paragraph 1.11

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	Paragraph 2.9	Comment	<p>Policy CS15 requires any leisure facility over 300sqm and more than 300m from the town centre to have an Impact Statement. The football club has over 3,000 visitors per season and any move to Longford Turning would mean visitors do not go into the town centre.</p> <p><b>Policy CS15 is referenced in SAMDev Policy MD10b in this regard. It is understood that reference to 'leisure facilities' in this instance are those that would normally be in town centre locations such as cinemas, and where out-of-centre locations would have a potential adverse effect on those centres. It would not apply to outdoor recreation facilities.</b></p>	No change proposed in relation to this representation
	Paragraph 3.6	Comment	<p>There is no business case for uprooting the sports facilities at Greenfields. There is no reason why the existing facilities cannot be enhanced. The Football Club has spent around £300,000 enhancing facilities at Greenfields since it gained promotion to the current league and developing and maintaining facilities, the majority of which was from its own fund raising efforts. Any move would need to be justified to local sponsors in terms of where has their money gone.</p> <p><b>The policy makes it clear that the proposal to relocate facilities will only take place if the current playing fields are replaced and associated facilities to enable their use provided. In addition, it is proposed that the new facilities will be better than those currently available at Greenfields and ensure higher standards for all current groups and promote greater participation and wider recreational activities for the health and wellbeing of the whole community. The current playing field is leased to Market Drayton Sports Association who, it is understood, recognise the benefits of the relocation in terms of promoting sports for all.</b></p>	No change proposed in relation to this representation
	Paragraph 4.16	Comment	<p>The statement that the clubs using the Greenfields playing field support the need to relocate is incorrect and untrue. A detailed letter was sent by the Club to all town councillors on 19<sup>th</sup> July 2016 and there has been no acknowledgement of this. This expresses concerns about:</p> <ul style="list-style-type: none"> <li>• No assurances that the move will meet the appropriate ground grading criteria that the football club is required to comply with or that adequate funding is in place to support the move.</li> <li>• The level of expenditure the Club has made (see above) and the need to obtain assurances from its sponsors that they would continue their support in the event of any move.</li> <li>• The Club needs revenue from gate receipts and its own club house to survive. Without a club house of the current size it would not survive.</li> <li>• The Club also needs main stand and club house sponsorship and pitch-side sponsorship and again could not survive if there was a shared facility.</li> <li>• Assurances are needed about a sinking fund or other funding to support the maintenance and repair of the new facility on the same footing as exists now. Equally should the club's expenditure be greater as a consequence of any move then we would also expect such differential to be funded by the move. Until we receive these assurances we will not support a move.</li> <li>• An estimate that 75% of local supporters walk to Greenfields at present. The proposed locations at Longford Turning is not within reasonable walking distance; this would have a huge impact</li> </ul>	No change proposed in relation to this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;"><b>Representation</b>  <b>Market Drayton Town Council Consideration</b></p>	Proposed Change Number
			<p>on attendance and an environmental impact. The transport links to Longford Turning are not supported at all for our 20 or so evening games a season.</p> <ul style="list-style-type: none"> <li>• The Club's Committee will not support any move which has a detrimental effect on its survival as a club or otherwise and we have no assurances at the moment other than vague plans to move elsewhere and how such moves might be funded and when. Our real concern is that mismanagement of this process or unfavourable terms will mean the immediate demise of the club.</li> <li>• We believe that in principle any revenue gained by the council from the sale of Greenfields should be wholly ploughed back into the sports facilities in the town.</li> </ul> <p>There is no mention of the community led sports hall or astro-turf pitch included in the Community-Led Town Plan of which 92% and 85% respectively supported. 57% said they are interested in Greenfields being used for housing in exchange for a new indoor and outdoor sports centre with recreation area elsewhere in another town location. There is no justification for the statement that current facilities are limited, inadequate for current and future needs with no capacity for their improvement. This is groundless and inaccurate.</p> <p>There has been no consultation with the football club regarding this. Equally it is staggering that the council makes this statement regarding all of the Greenfields clubs including the tennis club which also has up to date and modern facilities.</p> <p><b>There is a need for public playing fields to serve the whole community and currently the area is not able to do this. The number of clubs using the facilities has reduced in that it has not been possible to accommodate other clubs because of the growth of those already using the facilities. The pressures, both in terms of the need for further facilities and effect on residential amenity, are increasing while resources diminishing. Given that a significant amount of new housing is anticipated in this area, the level of evening matches, with associated noise and lighting, may increase pressure upon the Club to either relocate or curtail evening games. The proposal to relocate facilities will only take place if the current playing fields are replaced and associated facilities to enable their use provided. In addition, it is proposed that the new facilities will be better than those currently available at Greenfields and ensure higher standards for all current groups and promote greater participation and wider recreational activities for the health and wellbeing of the whole community. The Greenfields recreation- area is a public facility with lease arrangement between the Town Council and the Market Drayton Sports Association, to whom the Town Council also gives financial support. There are no lease arrangements with Market Drayton FC. Market Drayton Sports Association, upon which the football club is represented, and with whom the Town Council have the lease agreement were consulted and support the proposal. Inspection undertaken upon 3 home games suggest the extent of local support from people walking to the ground is overstated with between 7 and 12 visitors watching games on these occasions walking, while attendance was over 100 spectators. The proposed new site is within easy walking</b></p>	

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			distance of a significant proportion of town residents and in an area that may well expand because of anticipated housing growth.	
	Paragraph 4.16		If there is a problem with facilities for Rugby, then move that and use the space to provide extra facilities for the other sports users and Men's SHED. <b>The Plan looks at how the Town Council might provide for a range of sports. The policy seeks to address a range of shortcomings and this includes changing facilities for other sports currently with sub-standard facilities at Greenfields.</b>	No change proposed in relation to this representation
	Paragraph 4.18		Having stated the site is the only one available its price will now increase. <b>As with all matter of land acquisition this is a matter for negotiation and there are many elements that should be considered.</b>	No change proposed in relation to this representation
	Paragraph 4.19	Comment	<p>The location of the sports fields will positively discourage walking to Longford Turning. Only one third of the town's population is within 1 mile radius. Greenfields covers nearly all of the town's population within 1 mile. Would doubt anyone would walk to Longford Turning unless they were one of the third who live within 1 mile.</p> <p>The Strategic Environmental Assessment states that in relation to Longford Turning: <b><i>"the area is not as central to the town as the current site although it is within reasonable walking distance of residential areas. The policy requires measures to make the area as accessible as possible by walking and cycling. The current playing fields attract users from a wide area and these will vary over time. Consequently, the impact is both uncertain and variable to the extent that the change in location may have both positive and negative changes over time."</i></b></p> <p>So clearly notwithstanding the uncertainty regarding the location of the site as set out in the SEA the council are prepared to gamble with the future of the Football Club's future.</p> <p>We disagree with the comment in the SEA that "it is within reasonable walking distance of residential areas" – the point is, as demonstrated above, is that the Longford Turning has substantially less accessibility coverage than Greenfields and is wholly unsuitable.</p> <p><b>The policy seeks to provide facilities to serve the whole community comprising both the town and its immediate surrounding area and not just one club. The facilities available for this are limited on the current site and do not address the health and welfare benefits through promoting formal and informal recreation for the whole community. There is insufficient space to cater for all the football needs of the town, with some potential clubs having had to seek alternative facilities elsewhere because of the needs of the two football clubs currently using the ground. It is proposed that the new facilities will be better than those currently available at Greenfields and ensure higher standards for all current groups and promote greater participation and wider recreational activities for the health and wellbeing of the whole community. The</b></p>	No change proposed in relation to this representation



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			area is one that the SAMDev Plan(S11.1(3) indicates to form the extension of the town (i.e. to the north of the town). The site is on the edge of the current built-up area and within walking distance. The walking distance to the proposed site at Longford is potentially less and certainly no greater than that at Greenfields for many of the town's residents in that access to the latter is not direct.	
	Paragraph 4.20	Comment	The Messenger said that all of the proceeds from the sale of the land at Greenfields would be used to provide new sports facilities. There are mixed messages in the plan. The guarantees given in the Messenger should be given. <b>The NDP's policies in relation to this matter are clear and form planning purposes. The Sports Council has supported the proposal on the basis of the policies in the plan and it is understood its approach to any planning application would require no loss of playing fields.</b>	No change proposed in relation to this representation
	Paragraph 4.21 and 4.25	Comment	There has been no consultation with the clubs at Greenfields regarding a phased approach and whether this is possible yet this now appears to be central plank of the Neighbourhood plan. In the case of the football club, a move would have to be seamless due to the strict FA rules in place regarding ground criteria. There can be no games in temporary substandard locations. <b>The policy makes it clear that the proposal to relocate facilities will only take place if the current playing fields are replaced and associated facilities to enable their use provided. Consultation has been undertaken with Market Drayton Sports Association upon which it is understood the football club is represented.</b>	No change proposed in relation to this representation
	Paragraphs 4.22 and 4.26	Comment	There is no long-term community aspiration for the relocation of Greenfields Sports Facility. Residents are apathetic regarding sports facilities in the town and the Messenger said that <b>The possible relocation of the Greenfields recreation area has been an issue for a number of years and it is becoming increasingly important that the matter be addressed as described under the representation to paragraph 3.6 above.</b>	No change proposed in relation to this representation
	Paragraph 4.26		The recent National Referendum described a 2-3% majority in favour of "leave" is as a clear and overwhelming mandate yet in this instance a 3% majority against a Greenfields move is described as "roughly equal".  How will the council demonstrate that "all proceeds "arising from the sale from the sale of Greenfields will be invested in the new facilities. <b>The statistics are presented for all to see. In relation to the NDP the requirement is to ensure replacements facilities are brought forward for the land to be released for housing.</b>	No change proposed in relation to this representation
	Paragraph 4.27		There is no Stafford Road in Market Drayton? <b>Grateful for pointing out this typographical error</b>	See changes Nos 25 and 26

## Schedule 2: Stakeholder Representations and Response

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment <b>Market Drayton Town Council Consideration</b>	Amendment Number
S.1 Shropshire Council (Statutory Consultee)	Strategic requirements	Comments and Notes	<p>The NDP should be in broad conformity with the adopted Shropshire Development Plan, comprising the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015). However, it is appropriate for neighbourhood plans to seek to deliver additional sustainable development beyond the scope of the adopted development plan.</p> <p>SAMDev Policy S11 provides the development strategy for Market Drayton and establishes the overall housing guideline for the town up to 2026 of around 1,200 dwellings and 16 hectares of employment land; a development boundary for the town; allocates housing and employment sites to help deliver the guidelines; and confirms the town as a principal centre. Along with allocated housing sites at Rush Lane and Greenfields Lane it indicates there is potential to relocate the Greenfield Sporting facility, but a new location is not specified. Further to policy MD3 (of the SAMDev), the release of further greenfield land for housing will be focussed in the north of the town on sustainable sites adjoining the development boundary, subject to suitable access.</p> <p>Paragraph 4.113 of the SAMDev Plan confirms there may be an additional opportunity to deliver housing on the current site of the Greenfield Sports facility should this be relocated. Paragraph 4.114 confirms that given the high landscape value and environmental constraints to the south of the town, future growth will be focussed on sustainable sites adjoining the development boundary and subject to suitable access on the A53. The Draft NP tackles both these issues within its policies.</p> <p style="color: blue;"><b>This advice is helpful and noted</b></p>	No change proposed in relation to this representation
	Policy S.M1	Recommend changes	<p>Notes the proposal is for land outside the development boundary of Market Drayton within the parishes of Norton in Hales and Adderley. The land is countryside for the purposes of policy. It should be considered against relevant 'countryside' policies, principally CS5, which seeks to strictly control development in the countryside and states that proposals on appropriate site which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability or rural communities by bringing local economic and community benefits. The policy goes on to specifically identify sustainable rural tourism and leisure and recreation proposals requiring a countryside location as an appropriate use of to maintain and enhance countryside vitality and character.</p> <p>The main purpose of the NDP policy is to provide a new marina and for associated tourism and leisure uses, consistent</p>	See change 6

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;"><b>Comment</b></p> <p style="text-align: center;"><b>Market Drayton Town Council Consideration</b></p>	Amendment Number
			<p>with the approach set out in Policy CS5. The policy makes reference to providing a limited amount of enabling development in the form of market housing as part of the overall scheme. This should be referred as ‘cross-subsidy’ housing to distinguish it from the enabling development which is more commonly used in the restoration of heritage assets. When read alongside policy S.M4 – Land off Maer Lane, it is clear the release of this housing is conditional upon the development of the marina and may be subject to phasing to ensure that relationship is adhered to.</p> <p>There should be a clear cross reference to policy S.M4 within policy S.M1 to further clarify this relationship between the marina and the housing development.</p> <p>There should be a clearer acknowledgment that the additional uses referred to are to be ancillary to the main use of the site as a marina. This will help to define the scope and scale of the additional uses in any subsequent master plan (set out in S.M2).</p> <p>The scope of the proposed retail uses should be further explored and detailed as part of the final policy including discussion on the nature of the retail proposals, i.e. whether it is appropriate to apply restrictive conditions rather than an unrestricted A1 use. Conformity with the Local Plan policies CS15, MD10a and MD10b is clearly important. This policy framework emphasises the importance of a ‘town centre first’ approach to retail proposals. The proposed scheme is in an out-of-centre location. The scale or nature of the retail being proposed is unclear. Policy MD10b states that for Principal Centres (such as Market Drayton) retail proposals above 300sqm gross floorspace need to be accompanied by a Retail Impact Assessment to ensure there is no significant adverse impact on the town centre. In this regard the policy should clarify:</p> <ol style="list-style-type: none"> <li>1) Whether there are any restrictions on the proposed retail and what the proposed floorspace of the threshold is;</li> <li>2) If the retail element is over 300sqm gross, a Retail Impact Assessment should be prepared to inform and justify a retail use in this location, or make reference that a Retail Impact Assessment will be required through the preparation of any subsequent planning application on the site.</li> </ol> <p><b>The area around Market Drayton does not comprise Green Belt. In relation to Policy CS5, it comprises urban fringe and needs to be seen within this context, rather than fully rural countryside. The proposal comprises tourism, leisure and recreational facilities in accordance with policies CS16 and CS17 that will help sustain Market Drayton’s service centre function. In particular, it accords with Policy CS17 bullet 4, being one of a limited number of locations where a canal-side tourism and leisure facility can be developed that would create wider community, economic and regeneration benefits. The suggestion that reference to ‘cross-subsidy housing’ is recognised as more appropriate and a change proposed to accommodate this. Reference is made in the policy to the need for retail proposals to comply with policy MD10b (see S.M1, criterion 3) and emphasised in paragraph 4.11. The combined proposal is advanced on the basis that it will assist the town centre through attracting more people to it through the combination of services and facilities.</b></p>	
	Policy S.M2	Recommend	The need for development of the marina site to come forward as part of a master plan is sound. The scope of the	See changes Nos 7

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;"><b>Comment</b></p> <p style="text-align: center;"><b>Market Drayton Town Council Consideration</b></p>	Amendment Number
		changes	<p>masterplan is broadly appropriate, but the policy should make clear that other issues may also need to be addressed. It should define the scope and scale of the associated uses, and it is suggested this should be informed by a viability exercise.</p> <p>The master-planning process should address the sequential and exception tests identified within policy S.M4 concerning flood risk to the north west of Maer Lane, and this requirement should be clearly referred to in the policy.</p> <p>It will be important for work on the proposed masterplan to include input from Shropshire Council, as well as local groups and the community. Shropshire Council officers will clearly be important for issues such transport/accessibility, public transport, mineral safeguarding and sustainable design.</p> <p><b>Comments helpful and accepted</b></p>	and 12
	Paragraph 4.8	Recommend change	<p>This states that the proposed site would not adversely affect the heritage qualities of the Market Drayton Canal Basin Conservation. Is there any evidence to support this statement?</p> <p><b>Paragraph 4.8 describes the relative locations of the proposed marina site and that of the Canal Basin Conservation Area indicating they are entirely separate. The two areas are separated from each other by the A53 and this road and its associated features will mitigate any effect that the proposed development would have on the setting of the Conservation Area.</b></p>	See change No 10
	Paragraph 4.9	Recommend change	<p>Has this viability work relating to the marina been carried out? In addition to describing the proposed housing development as ‘cross subsidy’ rather than enabling development, it will be important for such a viability exercise to be undertaken to inform the proposed masterplan and help define the scope of the associated uses, including housing.</p> <p><b>The policy is an enabling one and changes are proposed to emphasis this. Planning proposals have been advanced previously for the development of a marina within this location and advice sought from agents who have experience of developing such schemes. This advice suggests that with the associated developments indicated in this plan, a viable scheme should be possible. Further, more detailed work to indicate viability would be undertaken in developing the masterplan and associated planning application. The use of the masterplanning process is emphasised in that this will include phasing arrangements in relation to the associated land uses. It is agreed that the master plan approach is the correct stage to present more detailed evidence of viability.</b></p>	See Change No 8
	Policy S.M3	Recommend change	<p>As points of clarification:</p> <p>1) Shropshire’s Open Space Planning Guidance has now been replaced by Policy MD2 of the SAMDev, so it is more important this reference is made;</p> <p>2) Shropshire Council does not provide vehicular parking standards, so I suggest reference be made to appropriate car parking provision instead.</p> <p><b>Grateful for this advice which will be incorporated</b></p>	See change No 13
	Paragraph 4.18	Recommend	This states that there would appear to be no alternative opportunities to provide this multifunctional recreational area.	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;"><b>Comment</b></p> <p style="text-align: center;"><b>Market Drayton Town Council Consideration</b></p>	Amendment Number
		change	<p>Whilst it is noted this goes on to specifically mention the unsuitability of the marina site, there is no reference to any formal site selection process. Such evidence will be important to inform the formal consultation into the Plan and the examination process.</p> <p><b>Other landowners in the area immediately to the north of the town have been approached but indicated land would not be available for this purpose. The indication within the SAMDev Plan that land in that direction might accommodate further growth is certainly a consideration in the minds of such landowners. The tests for land to be suitable and available have been addressed.</b></p>	in relation to this representation
	Housing Policies General	Recommend change	<p>By way of context, at March 2016, 417 dwellings have been delivered against the overall housing guideline of 1,200 for the town as set out in Policy S11. In addition, there are also 291 sites with planning permission and 250 dwellings on allocated sites yet to achieve planning permission. When ‘windfall’ opportunities within the town’s development boundary are accounted for, it is considered Market Drayton will be able to achieve its housing guideline as set out in policy S11. However, as already set out, a Neighbourhood Plan can clearly help the delivery of this guideline as well as supporting opportunities for achieving additional development on top of that identified in the development plan. It is therefore considered there is no inconsistency between these policies.</p> <p><b>Noted with thanks. The information is helpful.</b></p>	No change proposed in relation to this representation
	Policy S.M4	Recommend change	<p>This policy is linked to the delivery of the marina site set and the location of this site has been informed by this need. It would be useful if the policy referred specifically to the requirement for the housing on this site to cross-subsidise the marina development, and for the housing element of the scheme to be subject to the master-planning process set out in policy S.M2.</p> <p>Given part of the site is subject to flood risk and that the sequential and exception tests set out in the NPPF are relevant, it would be useful if Map 3 showed the extent of the flood risk areas.</p> <p><b>The advice is helpful. (NB Shropshire Council has assisted with the mapping for the plan and might be asked to show the area at risk of flooding on Map 3)</b></p>	See changes No 16 and 31
	Policy S.M5	Recommend change	<p>It is noted that land at Longford Turning (S.M3) is not specifically referred to in within the policy despite this being the preferred area for the relocated facilities.</p> <p>The phased release of land and transfer of new facilities if this is facilitated, the delivery of housing is noted. It is suggested that the policy seek to ensure that the transfer of facilities is not carried out in a piecemeal manner that would undermine the delivery of the new sporting facilities.</p> <p><b>The policy relates to the use of land for housing should the current recreational land be replaced. A reference to the land proposed for the relocated facilities might usefully be made. It is agreed that the need for a co-ordinated approach to ensure the transfer of recreational facilities should not be piecemeal.</b></p>	See change No 17
	Paragraph 4.27	Recommend change	This indicates that phasing arrangements would need to be agreed with both Market Drayton Sports Association and Market Drayton Town Council. It is considered this will also need to involve Shropshire Council as this will inevitably be linked to a planning application on the site.	See change No 18

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Market Drayton Town Council Consideration	Amendment Number
			<b>Advice is welcome and will be incorporated</b>	
	Paragraph 4.28	Recommend change	The evidence from local estate agents for single storey dwellings referred to should be provided to inform the examination. If sufficient evidence, should consideration be given for a similar provision as part of the Maer Lane housing development set out in Policy S.M4. <b>The evidence comprises discussions with local estate agents. The land off Maer Lane comprises small sites and such housing would better be provided on larger sites where a mix of housing can more easily be achieved. This does not suggest such housing would be resisted on the Maer Lane site but that it might not be the best and most appropriate location.</b>	No change proposed in response to this representation
	Policy S.M6	Recommend change	The Neighbourhood Plan needs to present evidence as to how the NPPF criteria are met for each of the 13 Local Green Spaces proposed. Without this clear evidence it may be difficult for this policy to be implemented in determining planning applications. <b>This advice is helpful and the areas been reviewed consequently. Some of the areas are special to the community and others serve more local needs. However, they both contribute towards the town's green infrastructure and its ecological network. As a consequence, the approach has been revised and only those sites considered special, in particular serving wider community interests are designated as 'local green space'.</b>	See Changes Nos 20 to 24
	Policy S.M7	Support and recommend change	This policy to regenerate a specific area of brownfield land within the development boundary of the town is welcomed. It is noted the policy identifies a fairly broad spectrum of potential uses on the site. The policy seeks rightly to protect amenity of existing uses and future uses within the site, as well as the impact on the conservation area. The policy could support the achievement further by seeking a more specific mix of uses to be included on the site. The site itself is fairly small and contained, and it may be difficult to accommodate all the currently proposed uses in a manner compatible with ensuring residential amenity is preserved. It is considered this policy is in conformity with the objectives of SAMDev policies MD10a, S11 and MD2. <b>There are only two suggested uses and the policy indicates a comprehensive scheme is required. This is to ensure they can fit sensitively together within the site. Flexibility is required and the criteria indicated are considered sufficient to address the concerns expressed.</b>	No change proposed in response to this representation
	Policy S.M8	Recommend change	It is considered this policy needs to refer to, and have regard to, Core Strategy Policy CS17: Environmental Networks and SAMDev Policy MD12: Natural Environment. <b>The reference is helpful although better included in the justification to the policy</b>	See change 28
	Policy S.M9	Comment	The policy seeks similar uses to that identified within Policy S.M3 for land at Longford Turning, and it would therefore be important to ensure the objectives of the policies are not competing with each other to ensure the best opportunity for delivery. <b>The types of activities anticipated within this area are explained in supporting paragraph 4.41 and these will not compete with those recreational activities proposed for Longford Turning set out in policy S.M3. They will primarily be informal activities for young people and use as a cultural venue. The size and topography of the site is itself a limiting factor.</b>	No change proposed in relation to this representation
	General		The Draft Plan includes a number of site specific policies. Although some of the options around the location of these sites	See change no 9

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Market Drayton Town Council Consideration	Amendment Number
	comment		is limited, such as the marina proposal, it is important to show clearly the considerations around the identification of these sites, and if there were any alternative options investigated, and if so why were they not included. <b>An addition is proposed to show how alternatives were considered for the marina development. Options in relation to the relocation of the playing field arise from an assessment of availability.</b>	
S2 Severn Trent Water (Statutory Consultee)	Whole Plan	Comment	No specific comments to make but also set out general information and advice. <b>Noted. Severn Trent Water will be consulted on any planning applications that may arise from this plan through Shropshire Council's consultation processes.</b>	No change required
S3 Historic England (Statutory Consultee)	Policy S.M7	Recommend change	There is a need to take explicit account of two grade II statutorily listed buildings that lie directly adjacent to the land proposed for regeneration. These are the Roman Catholic Church and Presbytery on Great Hales Street and 32-38 Stafford Street. Suggest amending the text at point ii) of the Policy to read: <i>"That the development takes full account of and avoids harm to statutorily listed buildings adjacent to the site and their settings and preserves or, preferably enhances....."</i> Also, since the site lies in the core of the historic town potential archaeological remains need to be considered. This could be through a further numbered policy section stating: <i>"Development proposals should also take account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Shropshire Historic Environment Record (HER). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence".</i> <b>This advice is welcome and adds positively to the policy.</b>	See Change No 25
S4 Natural England (Statutory Consultee)	Whole Plan	Whole Plan	Does not have any specific comments upon the draft NDP. Attached an Annex that covers issues and opportunities that should be considered. These cover landscape, wildlife habitats, priority and protected species and best and most versatile agricultural land, and measures to improve the natural environment. <b>No specific comments noted. The NDP has attempted to cover a number of the issues and opportunities raised and has a policy to protect local green space (S.M6), some of which include wildlife habitats, and a specific regeneration proposal for a wildlife corridor (S.M8) which makes reference to NE advice. Other policies refer to measures to promote local green space and habitats (S.M2, S.M3, S.M5 and S.M9). In addition, reference to relevant policies in the Core Strategy and SAMDev Plan are made.</b>	No change required because of this representation
S.5 Environment Agency (Statutory Consultee)	No response	Whole Plan	No Comments received in response to consultation <b>The Environment Agency was consulted by email and did not respond.</b>	No change required
S.6 Highways	Whole Plan	Whole Plan	Has no comments to make on this consultation given the application is a significant distance from our Strategic Road Network.	No change required

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Market Drayton Town Council Consideration	Amendment Number
Agency (Statutory Consultee)			Noted	
S.7 Market Drayton Community Partnership	Whole Plan	Support	<p>Overall it is felt that the Neighbourhood Plan contributes very successfully to moving the aspirations of Market Drayton into the next decade and should be both welcomed and unequivocally and strongly supported.</p> <ul style="list-style-type: none"> <li>the Plan is welcomed as a considered set of proposals to focus on major long term developments in Market Drayton which should help to underpin the economic and social well-being of the town</li> <li>it is understood that this plan builds on the ideas and concepts contained in the Market Drayton Town Plan published in 2011 but focuses on the longer-term future which is both timely and to be welcomed</li> <li>the proposals therein are felt to be those most practical of action and represent a wide range of issues that provide major opportunities and can and should be translated into reality</li> <li>major social and economic benefits would be realised which can only be to the benefit of the town and may take some years to come to fruition</li> <li>the ideas in the plan seem to be consonant with local and national planning priorities</li> <li>the detailed proposals are timely and need to be seen in the context of attracting external funding from developers as well as public funds and thus need wide scale public support</li> <li>it is vital that as Market Drayton is a hub for surrounding villages that support is forthcoming both from within the town and those communities which use facilities in the town and contribute to the local economy.</li> </ul> <p>Noted with thanks</p>	No change required
S.8 Loggerheads Parish Council (K Watkins)	Policy S.M1	Support	<p>The parish council supports the policy</p> <p>Noted with thanks</p>	No change required
	Policy S.M7	Qualified Support	<p>The parish council supports this policy. The route into Market Drayton that most residents from Loggerheads parish use is Newcastle Road and Stafford Street, an improvement in this access route would be welcome.</p> <p>Noted with thanks</p>	No change required
	Whole Plan	Qualified Support	<p>The parish council supports the policies in the draft plan and welcomes the intention to improve leisure and sports facilities. Good access into Market Drayton from the Loggerheads parish direction is needed.</p> <p>Noted with thanks. Although the NDP and Shropshire Local Plan seek to ensure development takes place in a safe manner improvements not associated with development is a matter that Shropshire Council is responsible for. No proposals have been identified within either Shropshire Local Plan or its Local Transport Plan that involve measures to improve accessibility in the Loggerhead Parish direction. Should Loggerheads Parish Council wish to suggest areas within Market Drayton Town Council's area that might be improved, The Town Council would consider whether these might be raised with Shropshire Council.</p>	No change required



Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Market Drayton Town Council Consideration	Amendment Number
S.9 Adderley Parish Council (J Evans)	Whole Plan	Objection	<p>The Plan contains land that falls within the Adderley Parish boundary and which Adderley Parish Council wants to include within its own Neighbourhood Plan.</p> <p><b>This intention should have been made known when the Parish Council was consulted in May 2015 upon the inclusion within Market Drayton Neighbourhood Plan area or to Shropshire Council during the Regulation 5 of the Neighbourhood Plan Regulations consultation period between 16<sup>th</sup> July and 28<sup>th</sup> August 2015. Shropshire Council approved the Market Drayton Neighbourhood Plan area following that consultation period.</b></p>	No change required because of this representation
S.10 Moreton Say Parish Council (J Evans)	Whole Plan	Objection	<p>The Plan contains land that falls within the Moreton Say Parish boundary and which Adderley Parish Council wants to include within its own Neighbourhood Plan.</p> <p><b>This intention should have been made known when the Parish Council was consulted in May 2015 upon the inclusion within Market Drayton Neighbourhood Plan area or to Shropshire Council during the Regulation 5 of the Neighbourhood Plan Regulations consultation period between 16<sup>th</sup> July and 28<sup>th</sup> August 2015. Shropshire Council approved the Market Drayton Neighbourhood Plan area following that consultation period.</b></p>	No change required because of this representation
S.11 National Grid	Whole Plan	Comment	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a></p> <p><b>Advice noted. National grid has been consulted on this draft NDP. It will be consulted on any planning applications that may arise from this plan through Shropshire Council's consultation processes.</b></p>	No change required

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S.12 J Morris on behalf of Sports England	Policies S.M3 and S.M5	Support	<p>The relocation of Greenfields is supported in principle providing better facilities and additional pitches are meeting the needs of the Shropshire Investment Plan for Market Drayton. A masterplan for the new playing fields will need to be agreed by the Council and Market Drayton Sports Association in conjunction with the relevant National Governing Bodies (and Sport England) and, as the policy states, the replacement facilities will need to be provided before the existing facilities are taken out of use to ensure continuity of activity for the various sports including the ancillary facilities required by the various clubs. A phased approach may be the solution to this issue but further details will be required (e.g. ground conditions) and this will require careful planning. Sport England and the relevant National Governing Bodies for Sport would be happy to have early dialogue in regards to the master planning of the replacement site and the management/lease arrangements. Sport England will be consulted on future planning applications for the Greenfields site and replacement playing fields at Longford. The planning applications will be assessed against relevant policies contained in the NPPF and Sport England's Playing Field policy.</p> <p><b>Noted – NDP paragraph 5.1 indicates that Market Drayton Town Council will work in partnership with other organisations to deliver proposals within the plan.</b></p>	No change required
	Policy S.M3	Comment	<p>Sport England support Market Drayton Town Council's commitment to providing enhanced and additional facilities for sport, recreation and general activity through the MDNDP.</p> <p><b>Noted</b></p>	No change required
	Whole Plan	Objection	<p>Objects to the inclusion of land from within its Parish in the Market Drayton Neighbourhood Plan. Market Drayton Town Council does NOT have the approval of the Parish to include parts of its Parish within its Neighbourhood Plan area and requests the immediate removal of its land from the Plan. Norton in Hales, Parish Council has registered intent to formulate its own complex Neighbourhood Plan. As such, it is inappropriate for another Council to include land from Norton in Hales within their Plan.</p> <p>For the purposes of the SAMDev Plan, Norton in Hales registered as 'rural countryside' with no wish for further development. To register land from within Norton in Hales Parish with the intention of developing that land is contrary to current planning policy and localism.</p> <p>The Parish Councils did not receive official notification of the decision of the Portfolio Holder for Planning, Housing and Commissioning (Central) Mal Price made on 3<sup>rd</sup> December 2015 that the 'Market Drayton Town council area and surrounds is an appropriate basis for the development of a neighbourhood development plan and notifies the Town and Parish Councils accordingly.</p> <p>Market Drayton neighbourhood plan would over-ride the aims and aspirations of the residents and Parish Council of Norton in Hales who were consulted in the SAMDev plan consultation process. The decision regarding inclusion in the SAMDev Plan was clear: no further development for the Parish.</p>	No change required because of this representation

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			<p>The statement that Market Drayton Town Council has sought and gained the approval from adjoining parish councils including Norton-in-Hales is factually incorrect and as it forms part of the basis on which approval for the Market Drayton Neighbourhood Plan was given, that decision is therefore fundamentally flawed. It has been noted that the local member for Norton in Hales has been omitted from the application details.</p> <p><b>The Parish Council was consulted by Market Drayton Town Council in May 2015 upon the inclusion within Market Drayton Neighbourhood Plan area and Shropshire Council undertook its consultation under Regulation 5 of the Neighbourhood Plan Regulations over the period between 16<sup>th</sup> July and 28<sup>th</sup> August 2015. Shropshire Council approved the Market Drayton Neighbourhood Plan area following that consultation period.</b></p> <p><b>In addition to proposals within this NDP, Shropshire Local Plan, in particular its SAMDev Plan policy S11.1(3) indicates that ‘further greenfield land for housing will be focussed in the north of the town on sustainable sites adjoining the development boundary, subject to suitable access’ and this may involve adjacent parishes including Norton-in-Hales. Therefore, for planning purposes the boundary between the town and its surrounding countryside is not a distinct one.</b></p>	
Canal and River Trist			<p>We note that the Vision clearly sets out the aspiration to support improvements to the environment and facilities, including the canal area.</p> <p><b>Noted</b></p>	No change required
	Policy S.M1		<p>Regard needs to be given to the Canal &amp; River Trust’s own process for dealing with marina or other offline moorings schemes seeking to connect to our waterways. There are risks over the deliverability and the ability to satisfy the basic conditions. A marina development may satisfy various land-use planning considerations but to be delivered, it would have to successfully pass through the Canal &amp; River Trust’s own application process. It would also have to obtain the necessary connection agreement which would permit it to physically connect to the Trust’s waterway network.</p> <p>Acceptability to the Trust is based primarily on consideration of availability of water resources, navigational safety considerations and potential impacts on SSSIs, taking into account other applications in the process at that time, and cumulative impact is considered. Over time, schemes may be withdrawn or removed from the process which can change the position regarding acceptability of new schemes seeking to enter the process. Environmental factors, together with new or changes to existing commercial abstractions (such as from farming, utilities companies and other industries) can also impact on the availability of water resources. In addition, a site may be deliverable in respect of water resources at the time that a plan is prepared by the Town Council (if the site successfully passes the first stage of our process) but may not be deliverable on adoption or during the lifetime of the plan if the applicant has withdrawn it or it is removed from the process. A site allocated for a marina in a development plan may not be delivered if it comes back into the Trust’s process and insufficient water resources were available.</p> <p>Marina proposals in the Trust’s process are confidential until an applicant determines they wish to make the proposal public knowledge, and there may be a number of proposals in the process at any given time on a particular waterway.</p>	See change No 6

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			<p>Consequently, it is difficult for both the Trust and accordingly the Town Council, to determine the deliverability of a scheme, given the competing factors and variables between the Trust’s own application process, the planning process and the timescales involved in both plan preparation/adoption and actual delivery of marina schemes from initial proposal to commencement of work on site. SAMDev Plan Policy MD11, whilst supporting canal side facilities and new marinas, acknowledges the technical constraints that can affect the location of marinas such as matters of water resource, navigational safety and topography. Pre-application discussion with the Canal &amp; River Trust are encouraged. We welcome that Policy S.M1 requires compliance with SAMDev policy MD11.</p> <p>We also question the compatibility of the uses proposed with the residential moorings at Nodens Victoria Wharf and how these will be protected through the policy or supporting text.</p> <p>The access arrangements from the A53 via Betton Road have the potential to adversely impact on the canal corridor and further details on the highway works required to support a marina development should be provided.</p> <p>There will also be an impact to the existing bridge crossing at Maers Lane (Victoria Bridge) Whilst the NDP seeks to direct traffic to the site from the A53 with the housing proposed under S.M4 it is likely that traffic levels across this bridge will increase. It is not clear if any modelling work has been undertaken? The bridge is Grade II listed and whilst it is currently in a generally fair condition it has suffered weathering and this is a “Weak Bridge”. As such its load capacity is under review, and the imposition of a weight limit may be required. The bridge is also very narrow and not suitable for significant HGV traffic (such as construction traffic or the movement of boats on low-loaders or cranes to/from the proposed marina) unless traffic management is implemented on the bridge (e.g. traffic lights), while re-profiling of the road approaches to reduce the hump-back nature of the bridge should also be seriously considered.</p> <p>The provision of pedestrian/ cycle movements across the bridge would also need to be considered in the light of increased traffic movements as there is currently only a very limited width pedestrian footpath. The NDP identifies a further canal crossing would be required and you may wish to consider if the policy should establish a requirement for the provision of a new crossing of the canal (also see our comments on S.M2). The Trust has not considered this in principle and we would strongly recommend that discussions are held with the Trust prior to the inclusion of any such requirement.</p> <p><b>Many land use changes also require approval under other procedures or regulations before they can proceed and the reverse would be the case should the Canal and Rivers Trust approve a proposal which may not have planning permission and subsequently be found not to meet other requirements. Deliverability needs to be looked at within the context of the relevant planning policies and in this instance the strategic and national policies are ones of enabling and promoting rather than setting strategic requirements that must be met through available, suitable and achievable sites.</b></p>	

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			<p>It should also be recognised that a number of previous proposals for a marina in this location have received the support of the Canal and River’s Trust predecessor – British Waterways. They did not proceed for one reason or another but it is hoped that a more comprehensive proposal such as that advocated within this plan will add to its encouragement, while similar proposals elsewhere have been successful. Market Drayton is well placed for such a development and it would achieve the benefit of broadening its economic base.</p> <p>Such a proposal must commence somewhere and through the NDP, will be shown to have the local community’s backing. Changes are nevertheless suggested that might address some of the Trust’s concerns. Meetings will be required with the Canal and River’s Trust to develop the detailed proposal as part of the masterplanning and planning application process.</p>	
	Policy S.M2	Support and recommend change	<p>The Trust supports the masterplan approach which is wholly appropriate for the nature and scale of development proposed. A Masterplan is a great opportunity to set out clear design aspirations and these could even be further developed within Policy S.M2. The development proposed under S.M1 &amp; S.M4 has the potential to significantly alter the character and appearance of this stretch of the Shropshire Union Canal and it is important that a holistic approach is taken to their design, layout and relationship to the canal and the Masterplan should cover both sites. The Trust would welcome the opportunity to be involved in any master planning process.</p> <p>Policy S.M2 could also be amended to include the infrastructure necessary to support the proposal and details of how these are to be delivered, e.g. as part of the development, S106 or CIL.</p> <p><b>This advice is welcomed and extremely helpful.</b></p>	See change No 7.
	Policy S.M6		<p>The Trust welcomes such a policy though we would note that neither the policy or supporting text make clear reference to the canal being part of this Green infrastructure network.</p> <p>The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways and it is therefore important that the canal corridor is acknowledged and applications required to consider their impact on its function as part of the Green Infrastructure network.</p> <p><b>This advice is acknowledged although it is also recognised that as a feature the canal is extensive, contributing potentially to the strategic ecological network which extends significantly beyond the limited boundaries of the NDP area. As such it’s value to biodiversity is better protected through strategic policies within Shropshire Core Strategy and the SAMDev Plan.</b></p>	No change proposed because of this representation