

## Representation Form

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

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

### Part B: Representation

Name and Organisation:	Lesley Durbin Much Wenlock Neighbourhood Plan Refresh Group
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="Reg 19"/>	Site:	<input type="text" value="S13"/>	Policies Map:	<input type="text" value="S13"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |

(Please tick as appropriate).

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

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

The full response to this question can be found in the attached documents  
SC LPR Reg 19 MWNP Final Submission 07 02 2021  
SC LPR Reg 19 MWNP Appendix 1 Consistent ministerial support for NPs 07 02 2021  
SC LPR Reg 19 MWNP Appendix 2 Options for sustainable development 07 02 2021

(Please continue on a separate sheet if necessary)

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

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

Our modifications are set out in full in the conclusions to documents  
SC LPR Reg 19 MWNP Final Submission 07 02 2021  
SC LPR Reg 19 MWNP Appendix 1 Consistent ministerial support for NPs 07 02 2021  
SC LPR Reg 19 MWNP Appendix 2 Options for sustainable development 07 02 2021

*(Please continue on a separate sheet if necessary)*

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

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

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

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

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

*(Please tick one box)*

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

**We have previously made substantive representations to Shropshire Council both in consultation and to individual officers and council members. Our representations have been consistently ignored without any responses from officers or councillors.**

*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

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Date:

07/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



## Much Wenlock

### Response to Shropshire Council

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

2016 to 2038

Feb 2021





**Much Wenlock**  
**Response to Shropshire Council**  
**Regulation 19: Pre-Submission Draft of the Shropshire Local Plan**  
**2016 to 2038**  
**Feb 2021**

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## **Appendices of Evidence**

Annex 1a (i) Community Involvement

Annex 1a(ii) SC Cabinet Minutes and documents

Annex 1a(iii) Closing the doors to discussion

Annex 1a (iv) Submissions to Shropshire Council

Annex 1b (i) Letters affirming government support of Neighbourhood Planning

Annex 1b(iv) Effectively delivering housing

Annex 2a (i) Much Wenlock Planning Committee Minutes

Annex 2a(ii) Challenges to Berry's at 'drop in event' Re MUW012

Annex 2a(iii) Community Facebook responses

Annex 2b(i) Alternative approaches and options

Annex 2b(iii) Evidence for delivering targets

Annex 2d (i) Much Wenlock Place Plan and SAMDev commentary

Annex 2d(ii) Much Wenlock Neighbourhood Plan Policies

Annex 2d(iii) Traffic and Flooding





## RESPONSE AND OBJECTIONS

### Shropshire Council Local Plan Review Reg 19. Consultation.

#### By the Much Wenlock Neighbourhood Plan Refresh Group

### 1. INTRODUCTION

1.1 This submission has been drafted by members of the *Much Wenlock Neighbourhood Plan Refresh Group*, a voluntary group of local residents. The Group was formed shortly after a presentation to residents at a public meeting in Much Wenlock on 3<sup>rd</sup> January 2019, by Adrian Cooper, then Shropshire Council's Planning Policy and Strategy Manager managing the Local Plan Review (LPR) process. Mr. Cooper outlined the LPR proposals and, in response to multiple expressions of serious concerns about these proposals, he invited suggestions of alternative approaches for the town.

1.1.1 Membership of the Refresh Group has been open to all; an advertisement was placed in the Wenlock Herald in February 2019 inviting people to join. The first meeting of the Group was held on 6<sup>th</sup> February 2019. The Group holds no political affiliation, funding has been entirely by voluntary donations and members have declared any relevant conflicts of interests at each meeting.

1.1.2 The stated purpose of the Group is: '*To ensure that Shropshire Council's Local Plan Review is informed as fully as possible by the views of the community. Our starting point is the policies and proposals set out in our Much Wenlock Neighbourhood Plan*'.

The Group has met on a regular and frequent basis throughout 2019 and 2020; the agendas and minutes of all the meetings are published on each occasion. In 2019 we organised 2 town-wide public consultation events and created a website and Facebook page to inform and enable community engagement and feedback. The Group has gathered and reviewed



evidence regarding development in the town and submitted several considered and evidence-led responses to Shropshire Council which reflect the feedback received from the community. In August 2020, the Group published and delivered to all households in Much Wenlock a leaflet giving details of the Regulation 18 consultation and encouraging residents to comment on the LPR.

1.1.3 The 2 public events in 2019 drew an attendance of 100 people and the leaflets we circulated in August generated a response of 130 comments (by mail, email and Facebook). Details of the work undertaken can be found here

<https://sites.google.com/view/mwnprefresh/home>

To our knowledge, outside of the short 3<sup>rd</sup> January 2019 meeting, Shropshire Council has not engaged with the community either before or since Covid-19 and the Town Council has not undertaken any engagement at all. We are the only group or organisation to consult with the whole town in any meaningful way on any stage of the LPR.

## **PURPOSE**

1.2.1 The purpose of this document is to outline the case and evidence against and reasons to change the approach set out in the Shropshire Council Local Plan Review, now known as the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, 2016 to 2038.

December 2020, (LPR Reg 19). This is especially in response to and prompted by Shropshire Council's (SC) 'preferred option' for Much Wenlock, that designates a particular site (now known as MUW012VAR) for a housing development of initially 80 and now 120 or more dwellings. The objection to the LPR Reg 19 is driven by SC's failure in its legal and moral obligations to consult and engage with the community, and its failure to recognise the importance of the sustainable and effective policy approach in the Much Wenlock Neighbourhood Plan (MWNP). It is, therefore, an objection to both the soundness of the LPR Reg 19 as well as to SC's fundamentally flawed approach to Much Wenlock.



## STRUCTURE

1.3.1 The submission that follows will detail the reasons for the objection. An Executive Summary is followed by individual sections addressing specific issues. There are six core documents which are relevant to all of the grounds for objection and reference to supporting evidence and documentation is made throughout the submission. Supporting evidence is noted in appendices and these can be found on

<https://sites.google.com/view/mwnprefresh/local-plan-review/mwnp-submission-to-sc-annex-of-evidence-final-sept-2020?authuser=2> .

<https://sites.google.com/view/mwnprefresh/home>

It is split into three broad sections relating to:

- 1) **Soundness** - principles around lack of consultation and ignorance of national and local policy
- 2) **Place** - the particular circumstances of Much Wenlock that require an alternative and more sustainable approach to be considered and
- 3) **Conclusions** – how we suggest the LPR should be changed

## 2. EXECUTIVE SUMMARY

**2.1 In summary, the Shropshire Local Plan Review and LPR Reg 19 fails to satisfy and comply with national policies, it fails to consider alternative and better planning solutions, it is based on flawed assessments, it has failed to consult lawfully and meaningfully and ignores relevant evidence including that from the community.**



2.1.1 Shropshire Council (SC) has placed an overriding emphasis on the delivery of an extra 200 houses for the town to 2038 and imposes a single large housing site which will be developed within a few years. It has done so:

- Contrary to SC's own legal commitment in its Statement of Community Involvement to proper and ongoing public engagement with local people
- Without proper engagement with the community to consider and to agree appropriate choices for future development
- Without considering alternative more sustainable approaches and the substantial evidence base which supports alternatives as the better planning solution than a single large site
- By overriding the key elements of the considered and community-wide agreed policy approach of 'limited development to meet local needs' and that development should be through small scale sites (as set out in the MWNP 2013-2026)
- In the absence of an up to date town and catchment wide strategic assessment of the serious risk to human life and property due to surface water flooding
- Contrary to national planning policy and guidance and the direct advice of the MHCLG (received by the Refresh Group) that the Local Plan must not override the direction set by the MWNP
- By suggesting the site allocation is a 'strategic proposal' when even the Draft Local Plan (S13) only states it will 'contribute towards' growth; truly strategic sites for development include the major redevelopment of the Iron bridge Power Station that is within the Much Wenlock Place Plan area.
- By ignoring the additional housing which will be delivered within the Place Plan area at Ironbridge
- Without explaining how the Draft Local Plan housing proposals will meet local needs, as claimed, or why the levels of development are set at the scale suggested



- Contrary to the NPPF which requires development to avoid areas prone to flood risk and contrary to current Local and National Flood Risk Management strategies which emphasises working with communities to develop resilience to risks
- Without identifying a deliverable programme of investment in the significant and obvious weaknesses of the town's infrastructure that is necessary to make growth sustainable
- Without properly assuring the delivery of employment opportunities needed by the town if the objective of 'balanced growth' is to be achieved
- By putting forward development choices which do not address a response to the climate emergency facing Shropshire, the UK and the Council itself
- By not considering previous steers from the Planning Inspectorate about the risk of overdevelopment on the unique character of the medieval, small rural town in undermining its economic success as a tourist destination
- By ignoring the strategic implications of wider LPR Reg 19 proposals and in particular the cumulative effects of the large scale development in Much Wenlock, combined with the 1000 houses at Iron-bridge Power Station to the north, 500 houses on the livestock market, Bridgnorth and the preferred development of 1050 dwellings at Tasley (to the west of Bridgnorth off the A458 road to Much Wenlock), all of which will overwhelm the road infrastructure and the pinch point at the 'Gaskell Corner' in Much Wenlock.

### **Summary of Section 1: Unsoundness and lack of conformity with national policy**

2.2.1 Shropshire Council's approach to the LPR is unsound and does not conform to national policy. At its heart there is a key concern that, through a limited 5 year review of the housing and employment targets for the county, the Council feels it has the right to simply ignore and reject, without justification or consultation, the Much Wenlock Neighbourhood Plan (MWNP) which expresses the intent of the community. It has also failed to take a



strategic approach or evaluate alternative options towards policy. These concerns can be grouped into 3 headings and the main points are summarised here.

**1a: Consultation on the LPR has been completely inadequate and at a level which is contrary to statutory guidance and legal expectation.**

2.3.1 Shropshire Council's Statement of Community Involvement (SCI) states it will practise open and continuing engagement with the community but in practice it has done no such thing. When it has received comments and suggestions of alternative approaches it has failed to engage in discussion. It is, therefore, clear that the LPR process has not been undertaken in a way which fulfils SC's own commitments of meaningful community consultation as set out in the Statement of Community Involvement and as required in statute. It is not compliant with legal requirements and legitimate public expectation and is accordingly unsound.

2.3.2 This is contrary to national guidance and ministerial advice. Additionally, the recent Govt white paper continues to place community consultation at the heart of Local Plans and place-making; see page 18 of *Planning for the Future* (MHCLG, White Paper August 2020; [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)).

**1b: Failure to consider relevant evidence, significant community feedback, the legally made Much Wenlock Neighbourhood Plan; setting aside national policy and guidance including the function and importance of Neighbourhood Plans.**

2.4. The Much Wenlock Neighbourhood Plan

(<https://sites.google.com/view/mwnprefresh/neighbourhood-plan>) represents a significant contribution by the community of Much Wenlock to determine the future and quality of the town in which they wish to live and work. It represents three years and over a thousand



hours of community input culminating in the independent assessor, Andrew Ashcroft, stating (in his formal report in 2013, para 2.7) that:

*The Plan has been prepared in a very professional way. Its design, policies and approach are informative and easy to understand, and it is clear that there has been a high degree of community support and interest. Much of this is captured in a well-presented web-site. The Plan is very comprehensive and sets out 40 policies underpinning nine objectives. This is a huge challenge in itself for a neighbourhood planning group.*

2.4.1 The MWNP is the expression of the community's expectations for the type and scale of development for the town to 2026. The MWNP was supported by 84% of residents in the referendum of 2013, adopted by Much Wenlock Town Council in April 2013 and was 'made' by Shropshire Council in July 2014. The apparent unwillingness of SC to recognise the importance of this community-led decision making process is a failure on the part of the Local Authority and is contrary to government policy and national planning guidance for Neighbourhood Plans that asks emerging local plans not to override statutory neighbourhood plans.

2.4.2 The proposed LPR seeks to undermine the MWNP through a change in the development boundary, by dropping a fundamental policy approach adopted in the MWNP, consequently imposing a significant new large site for development without consideration of alternative more sustainable approaches [see **Annex 1** to this document; 'Much Wenlock – Options for Sustainable Development']. Furthermore SC has done this by avoiding public engagement through a review of the MWNP and examination or referendum. In doing so SC is ignoring its own LPR Policies where it undertakes to '*build consensus around shared local priorities and proposals*' LPR Reg 19, 2.22, p 9.

**1c. Flooding and the Rapid Response Catchment – lack of a strategic, catchment-wide approach and failure to meet lawful obligations set out in national policy**



2.5. The whole of Much Wenlock lies within a designated Rapid Response Catchment at risk of serious surface water flooding. The LPR Reg 19 site allocation (previously known as SC's 'preferred option') is proposing development on what is commonly understood to be one of, if not the most flood-prone areas of the catchment for Much Wenlock. This is contrary to national planning guidance and the Government's guidance on flood risk and preparations for climate change.

2.5.1 At the county or strategic scale, in accordance with Paras. 155 to 158 of the NPPF, there is a strong argument that says development proposals should be directed away from the town altogether. A strategic flood risk assessment is required by national policy and this needs to be undertaken prior to any site allocations. This has not been undertaken and the task of securing the community from flood risk has been left to partial and limited proposals from a single landowner and commercial developer.

2.5.2 There are very significant and serious risks attached to the LPR's approach of relying on this non-strategic proposal. These arise from Much Wenlock's unique circumstances. The severe floods of 2020 were part of a sequence of serious flood events that had impacts across the town. Following significant flooding in 2007, agreement was reached between all stakeholders on the construction of attenuation ponds along the course of two clearly established and identifiable water courses on the western side of Much Wenlock. These attenuation features, now complete, have proved effective in reducing but, as demonstrated in 2020, not fully addressing flood risk in areas threatened by runoff from the dip-slope of the Wenlock Edge. These were implemented without the need for new housing development. .

MUW012VAR does not comply with SC's own policy criteria DP21 in the LPR Reg 19 (p 130) which states that *'The safeguarding of people and property and mitigation of the effects of climate change in accordance with Policy SP3 will be achieved by directing development to areas at least risk of flooding'*





2.5.3 We show in Annex 1 ('Much Wenlock –Options for Sustainable Development') that alternative sites which have already mitigated the effects of flooding through the installation of attenuation ponds are available.

2.5.4 The complex geo-physical local circumstances mean that simple site related attenuation schemes are not appropriate. In combination with the policy drivers set out in the new National Flood Risk Strategy (July 2020), these demand a more sophisticated and integrated approach and show why a strategic flood risk assessment of the entire catchment is necessary. The situation demands that options and solutions should be identified for the whole catchment and these should be discussed with the community. They can then be agreed and funding sought from substantial new resources committed by the government. This can and should be in advance of the consideration of further development that will inevitably add to the risk.

#### **1d Transport and Accessibility Summary**

2.6. The proposal by Shropshire Council to bring forward a Hunter's Gate extension scheme (MUW012VAR) as its LPR Preferred Site is flawed from a Transport and Accessibility perspective. Page 86 of our submission contains a fuller assessment of the impact of MUW012VAR. This includes – as an exemplar - a comparison with a more suitable site (MUW008) identified by SC; this is closer to the town centre, with considerably better pedestrian and public transport accessibility and not isolated outside the southeast limit of the town. It does not have the detrimental impacts of the 'preferred' site that has its own roundabout access which will introduce delays, noise and street lighting onto the A458 (Bridgnorth Road) and badly impact both congestion and air quality at the critical Gaskell Corner junction. This junction suffers from continual demand pressure which will be significantly increased by a minimum of 100 HGVs per day when the proposed mineral extraction at the former Ironbridge Power Station site commences. The allocation of MUW012VAR is contrary to both the NPPF and good practice which stipulates that



development sites should give priority to pedestrian and cycle movements; facilitate access to high quality public transport and whose impact on the highway network and safety can be mitigated.

2.6.1 The traffic congestion and air quality impacts on the town's Conservation Area will be further exacerbated by the LPR Reg19 proposal (3.142. p64) which designates, the 'strategic corridors' as including '*Eastern Belt A4169/A458/A454, supporting Shropshire's motorway, road, and rail links to the West Midlands*'. Combined with the LP Reg 19 proposal to accommodate 1500 houses and 30ha employment land for the Black Country under its 'duty to co-operate' place great risk that Much Wenlock on the east side of the county will become a commuter settlement for the Black Country and for Telford.

## **Summary of Section 2: Place – a detailed critique of the Local Plan Review's**

### **'preferred option'**

2.7 Section 2 develops the case against the LPR 'preferred option' in more detail and especially in respect of the quality of the process by which the option was identified. We have drawn the essential argument into a structure of 4 headings or grounds of objection and the key points are summarised here.

### **2a Consultation and the expectations of the Much Wenlock Neighbourhood Plan**

2.8 Throughout this process Shropshire Council has relied on a single public meeting in January 2019, at which there was no transparent method for residents to record their responses to the proposal for a 'preferred site' option. SC has also acknowledged a reliance on the recorded opinions of the Much Wenlock Planning and Environment Committee.

2.8.1 The recorded responses of Much Wenlock Town Council and its Planning and Environment Committee have left many in the community confused; it is clear however, that, so far, the MWTC is not recorded as having 'supported' the allocation of 200 dwellings in the



revised LPR Reg. 19. We describe the confused trail of local decision making in full in Section 2.

2.8.2 Both the adopted Much Wenlock Neighbourhood Plan and the recent Refresh Group Community Consultations have shown that full clear and transparent consultations will give different outcomes to those of negotiations and deliberations behind closed doors.

We also suggest that the way that SC gathered and analysed the response to their single online consultation. As a result of the Place Plan structure SC have used, this combined Cressage and Much Wenlock into one block has resulted in what is generally perceived to be a skewed analysis. It becomes clear on reading the analysed results that residents of Cressage were included in answers to question concerning development in Much Wenlock (as a key centre) and vice versa (*See Annex 1a (i) p 9-10*). This process is both flawed and then builds the wrong picture as the LPR Reg 19 discounts Place Plans as being a formal part of the Local Plan.

**Section 2b Alternative more sustainable approaches and options - certainty & deliverability, the flawed site assessment and climate change.**

2.9 The recent community consultations carried out by the MW Refresh Group together with local and national research, show that there are many different approaches available other than the one large development fits all approach. This has implications for meeting local needs as well as the style, location and scale of development.

2.9.1 We show that SC's 2020 Place Plan Site Assessments and the choice of MUW012VAR as the preferred development site is flawed when the LPR's own policies (SP1. The Shropshire Test, 1. b,c,f,&g. and SP3. Climate Change 1a ) are applied. The negative impact on flooding, access to recreation and other services and the vitality of the High St. was also exposed by reference to policies of the MWNP, the Shropshire Council



MW Place Plan, SC's Open Space, Sport & Recreation Interim Planning Guidance, Annex 2d(i) p 4 and Samdev policies. Annex 2d (i) p 2-3

2.9.2 SC's approach in its lack of consultation means it has not drawn on local evidence from the community. Combined with its inability to make effective site comparisons misses the opportunity to achieve a more integrated and sustainable community with easier access to all basic facilities, notably providing for easy walking access to shops and leisure facilities for all age groups. The LPR has not considered alternative development options which can avoid the need for car travel and support smaller single level development sites near the town centre (e.g. for the older generation of residents). All of which would contribute realising sustainable development and delivering Shropshire Council's commitment to Policy SP3 Climate Change 1 (a) and 1(d) and the underpinning Policy SP1 'The Shropshire Test'. Unlike MUW012VAR, the brownfield sites MUW01 and 02 within Much Wenlock development boundary would be a positive contribution to sustainable development.

2.9.3 LPR Reg,19 2.7. The divergence between Shropshire and England's population age is evident, with Shropshire having a much greater proportion of people in all age groups above 50 years. In contrast England has a substantially higher proportion of population in all the younger age groups. However, greater consultation with the community, the use of the evidence base created for the MWNP and Shropshire Council's own housing and Homepoint figures (see the Housing Report on the Refresh Group web site) show that there is a greater need for smaller homes to suit young buyers and downsizers, as well as single level dwellings for older residents.

2.9.4 We suggest that an alternative approach which utilises smaller and brownfield sites is entirely in keeping with the community's aspirations in the MWNP. Alternative and Sustainable Options for Much Wenlock are discussed in Appendix 1 to this submission. Furthermore this style aligns better with the Government's direction for the future of planning to make planning more inclusive and create more beautiful places.

## **2c Flooding events; addressing and managing the long term risk**



2.10 Flooding in and around Much Wenlock has a long history and the causes derive from its geological and hydrological context, compounded in more recent years with extensive development of housing in the landscape bowl in which the town sits.

2.10.1 It has had serious consequences for the community in recent years with major flood events in 2007 and 2020. A letter from the Town Council to residents of Hunters Gate in May 2020 states that some 308 properties are still at risk. Limited investigations into the origins of flood events, some lacking transparency, have been accompanied only by partial remediation. Some parts of the town have recently been better protected while others, including the area around preferred site MUW012VAR, have been badly neglected.

2.10.2 The LPR process for determining development in Much Wenlock and the allocation of MUW012 contravenes national and SC's own local policy. Policy DP.21 Flood Risk (p.130) states that; *'The safeguarding of people and property and mitigation of the effects of climate change in accordance with Policy SP3 will be achieved by directing development to areas at least risk of flooding'*

2.10.3 SC's proposed approach directs substantial development to a flood-prone catchment and in particular the most flood-prone site in that catchment.

Greater risks to the community are likely especially in the context of increased development and with uncertain climate change. Those living downstream from the town remain in a particularly vulnerable position. Whilst numerous practical studies have been undertaken, full understanding of the causes and potential solutions is lacking. This has led to high levels of mistrust of both the Council and its associated developer. A comprehensive, catchment wide assessment backed up by an agreed and appropriately funded overall remediation is urgently needed in order restore public confidence. This would be in accordance with SC's Local Flood Risk policy (2015), currently being ignored.

2.10.4 The community's strong opposition to the concept of development-led flood alleviation derives from costly local experience. It is doubly confusing that SC's only commitment to



infrastructure investment in Much Wenlock (in its Infrastructure Funding Statement, December 2020) is in a non-development led scheme funded by EA and Severn Trent. This would suggest that the rationale for a large 120 house site is no longer valid. The proposed 'solution' also ignores alternative options for natural flood management now at the heart of Environment Agency and Government strategy.

## **2d Current Local and Place Plan policy and infrastructure needs**

2.11 The current Much Wenlock Place Plan makes full acknowledgment of the existence Much Wenlock Neighbourhood Plan. Infrastructure needs of the Place Plan Area are set out in the Much Wenlock Place Plan which clearly alludes to emerging problems with traffic and road safety, sewage capacity, flooding and NHS provision. It is also noted that there is a need for more accessible green space. *'Development should be phased appropriately to take account of critical infrastructure delivery and seek to positively contribute towards local infrastructure improvements, including the provision of community benefits.'* (P 16-20 MWPP)

2.11.1 LPR Reg19 on p241 Schedule S.13.2 includes both Cressage and Buildwas Schedule S13.3 the Community Hub and Cluster for Much Wenlock, without any consideration that development in both settlements will have considerable impact on infrastructure in Much Wenlock, particularly the Medical Health Centre which serves all three communities.

2.11.2 The LPR Reg 19, 2.13 p 7 states that *'These Place Plan geographies are well established and represent areas with functional relationships with each other and as such have been used to capture the infrastructure needs of Shropshire in a manageable way.'* *If this is the case, we suggest that the housing numbers required of the town as a Key Centre*



*have been addressed at the Power Station site and/or the infrastructure levy from those 1000 houses needs to deliver significant improvements for Much Wenlock.*

2.11.3 There is plainly no clear solution or infrastructure delivery plan in the LPR Reg 19 to the very real concern by many residents of both Cressage and Much Wenlock that these shortfalls will be addressed. Shropshire Council's Infrastructure Similarly the LPR does not take into account the significant changes in context, including the redevelopment of the Ironbridge Power Station and changes in national planning and flood risk policy and delivery. It is also of concern that the LPR Reg 19 relegates the Place Plans as not being a statutory part of the local plan and therefore have no weight in decision making. This despite being a fundamental part of local policy making.

#### **2. 11.4 Summary Section 3: Conclusions and recommendations - Five proposed changes to the Local Plan Review**

- 1) **The 'preferred option' site MUW012VAR should be deleted.** We propose that the location and type of the relatively minor addition to overall housing numbers should be addressed through a review of the MWNP so that it can be accommodated on terms expressed by the community and in line with sustainable development and climate change policies.
- 2) **Employment land needs to be actively brought forward.** To achieve sustainable balanced growth, we suggest that the LPR Reg 19 should identify a delivery plan for employment land and, as with housing sites, the allocation should be subject to the catchment wide flood risk assessment.
- 3) **The Local Plan should commit that a strategic flood risk assessment will be undertaken as a priority and will underpin all future development policy and decisions.** We suggest that the LPR Reg 19 commits to undertaken the flood risk assessment for the whole catchment and that development proposals are considered



in the context of clearly defined options, including nature based solutions for addressing the risks.

4) **Shropshire Council should commit to proper and lawful community**

**engagement through a Neighbourhood Plan review.** We propose that the LPR includes a commitment to a meaningful consultation process about the future of the town which is based upon working with the community on a review of the MWNP and which integrates solutions to flooding, infrastructure and development needs.

5) **Identifying a deliverable programme of infrastructure to meet the town's needs, which are in line with current policies on climate change and sustainability.**

We suggest that a deliverable programme of improvements to the town's infrastructure should be identified and agreed with the community alongside funding arrangements and clear links made to development proposals so the benefit of that development can be recognised.

## 2.12 Supporting evidence and documents

Reference to supporting evidence and documentation is made throughout the submission and can be found on <https://sites.google.com/view/mwnprefresh/local-plan-review/mwnp-submission-to-sc-annex-of-evidence-final-sept-2020?authuser=2> .

There are six core documents which are relevant to all of the grounds for objection and these are;

1. Report of community consultation events 6<sup>th</sup> and 9<sup>th</sup> April 2019

Responses from the 'Have your Say' leaflet.

<https://sites.google.com/view/mwnprefresh/home>

<https://sites.google.com/view/mwnprefresh/community-engagement-april-2019/narrative-statement-of-the-feedback-received>

2. Certainty and Delivery Report





3. Much Wenlock –Options for Sustainable Development Annex 1
4. Much Wenlock Final Submission to the LPR

<https://sites.google.com/view/mwnprefresh/local-plan-review>

5. Our response to the Ironbridge Master Plan

<https://docs.google.com/document/d/1x9blaNRJaMvrWXjhdc7k8M5dlpHXbjhyVi4afETZhzw/edit>

6. Much Wenlock Neighbourhood Plan

<https://www.shropshire.gov.uk/media/8560/much-wenlock-neighbourhood-plan-adopted-version.pdf>

## SECTION 1

### 3.1 Unsoundness and lack of conformity with national policy

- a. **Consultation on the LPR has been completely inadequate and at a level which is contrary to statutory guidance and legal expectation.**

3.2 Local Plan Regulation 22 requires plan making authorities to demonstrate transparently that necessary and legally compliant consultation has been undertaken during the course of plan preparation (in accordance with the published Statement of Community Involvement); and that the consultation responses have been noted, understood and, where applicable, taken into account in formulating the content of the plan under preparation.

[https://www.local.gov.uk/sites/default/files/documents/PAS\\_Reg%2022\\_April\\_2020.pdf](https://www.local.gov.uk/sites/default/files/documents/PAS_Reg%2022_April_2020.pdf)

SC should 'Set out salient background information with cross references to the Statement of Community Involvement (SCI)' [See page 8 of the above link]



Shropshire Council's (SC) Statement of Community Involvement (SCI) was adopted in 2011 and received a technical update in 2014. The SCI was not updated for the purposes of the local plan review process. We would point out that Section 6 of The Neighbourhood Planning Act (2017) requires Councils to spell out, in their SCIs, exactly how they will help neighbourhood plan-making bodies ([section 6](#)). This has not been done. The SCI contains only one reference to Neighbourhood Planning, in as much as they should resemble Town Plans, neither are there any separate references to Neighbourhood Planning since the 2017 Act.

3.2.1 The SCI commits to '*ensuring early and meaningful engagement with local communities*'. Paragraphs 1.4, 1.8, 2.3, 2.5, 3.3 & 4.15 and Table 4.3 are all highly relevant. This commitment to a high level of local engagement is repeated in the Local Development Scheme (2018 and 2019) and papers to Cabinet (e.g. 16<sup>th</sup> March 2016 and 18<sup>th</sup> January 2017).

3.2.2 LPR Reg 9. 2.22, p 9 continues to assert '*At the core of this process is continuous and meaningful community engagement*', citing a list of on-line consultations, only the last of which took place during the Covid pandemic. It is generally accepted that not every household has access to computer, nor is every household computer literate enough to engage with the complex and difficult processes residents were faced with when attempting to answer the finite and specific questions asked in Shropshire Council's agency-led consultations.

3.2.3 However, this has been simply a 'paper' commitment. The Cabinet paper on the LPR of January 2017 did not mention Neighbourhood Plans (NPs) and, remarkably, in one of the few communications, this was described as an 'unintentional oversight' by the then Strategic Planning Manager.

Email 16<sup>th</sup> Jan 2017 *Annex 1a (i) p3-4*



This is the link to the Cabinet meeting of January 2017 <https://shropshire.gov.uk/committee-services/ieListDocuments.aspx?CId=130&MId=3261&Ver=4> *Annex 1a (ii) p3-7*

3.2.4 This is a copy of the January 2017 report 'Consultation On Issues And Strategic Options For The Shropshire Local Plan Review' which makes no mention of NPs yet references SAMDev and commits to consultation as per the SCI

<https://shropshire.gov.uk/committee-services/documents/s14111/7%20Consultation%20on%20Issues%20and%20Strategic%20Options%20for%20the%20Shropshire%20Local%20Plan%20Review.pdf>

3.3 Beyond the on-line publication and invitation to comment on the LPR, there has been only one engagement with the community. This was a short presentation to residents at a public meeting in Much Wenlock on 3<sup>rd</sup> January 2019, by Adrian Cooper, then Shropshire Council's Planning Policy and Strategy Manager managing the Local Plan Review (LPR) process. Mr. Cooper outlined the LPR proposals and, in response to multiple expressions of serious concerns about these proposals, he invited suggestions of alternative approaches for the town. In response, local volunteers organised two public events in April 2019 which provided constructive feedback into the LPR process; SC planning officers were invited but did not attend the events. No response to the public comments has been received and the invitation to discuss further was not progressed; indeed the content of the Draft Local Plan Reg 19 indicates these efforts were ignored.

3.4 The absence of commitment to community engagement and discussion about the issues relevant to Much Wenlock was revealed early on in the LPR process. Correspondence from Shropshire Council's Strategic Planning Manager suggests a commitment to aligning expectations (in his correspondence and in later reports) which has clearly not been addressed in any structured form. Indeed, subsequent emails in 2019 close the door to options, shunting genuine concerns about the LPR being dealt with at the Examination in Public as the place for the discussion. *Annex 1a (iii)*

3.5 When questioned at Cabinet, 14<sup>th</sup> Dec 2020 by a resident of Much Wenlock under Public Questions, Shropshire Council did not address the problem but simply repeated that these issues would be left to the Examination in Public;

*'All residents, alongside other stakeholders, will have a chance to comment on the soundness of the Local Plan as part of the upcoming consultation on the Regulation 19 Plan, and all these comments will be seen by an independently appointed Planning Inspector when the Plan is submitted to the Government for Examination, currently scheduled for April 2021'.*

3.5.1 This glaring lack of any 'meaningful' community engagement is especially unacceptable given the existence of the MWNP. The Council's attitude that the LPR 'wipes the slate clean' of anything in the Neighbourhood Plan was reiterated in a letter from SC to Philip Dunne MP on 11<sup>th</sup> March 2020. Yet the importance of neighbourhood planning and expectations of strong community engagement where Neighbourhood Plans are concerned has been repeated in the Neighbourhood Planning Act

<http://www.legislation.gov.uk/ukpga/2017/20/contents/enacted> as recently as 2017 when local authorities were required to set out their support within the SCI. This weight to NPs has been reiterated in national planning guidance, the NPPF (para 129), in recent Ministerial letters (see letter from MHCLG of 23<sup>rd</sup> May 2019) and MHCLG communications Annex 1b (i)

3.6 The SCI makes strong mention of community involvement through Town Councils, but does not include community groups, thus leaving out important groups such as Civic Societies and other community representatives. See LPR Reg 19 2.3 and LPR Reg 19 Introduction 2.3

*'All this should be done in collaboration with a range of stakeholders from local communities'*

Our understanding is that members of the Much Wenlock Town Council (MWTC) met with SC officers on just one occasion on 7th November 2017 and, without consultation with the



community, endorsed the LPR 'preferred option' on 8th Jan 2019. This was in spite of the clear concerns raised at the presentation on 3<sup>rd</sup> January 2019 and it followed an invitation by the MWTC to the landowner of the 'preferred option' site to explain its proposals (MWTC Planning Committee meeting of 5th September 2017). SC did not agree any approach with the Much Wenlock Town Council for wider consultation. Annex 2a (i) p1

3.6.1 The MWTC Minutes of 17<sup>th</sup> Jan 2019 (Item 6) further illustrate the lack of public engagement;

*6) Shropshire Local Plan Review 2016 – 2036 – Preferred Sites – Much Wenlock section*

*a) The Committee had considered only the Hunters Gate site.*

*In summary, the Planning Committee supported the [then 80 house] development at Hunters Gate.*

3.6.2 MWTC minutes 4<sup>th</sup> April 2019 (Item 12) state;

*It would seem appropriate to review the Plan at some stage to maximise its weight in decision making and ensure its compatibility with the Local Plan planned for adoption in 2020/2021.*

*In order to ensure the Neighbourhood Plan continued to carry maximum weight as a decision influencing document timing was critical. It was noted that there was no legal requirement to review or update a Neighbourhood Plan. Policies might become out of date if they conflicted with a Local Plan that was updated after production of the Neighbourhood Plan. The most recent Plan would take precedence. The Council had sought advice on the legal position and two separate bodies had confirmed that the Town Council was the Qualifying Body in Much Wenlock and only the Town Council could update the Plan.*



*It was PROPOSED, SECONDED and unanimously RESOLVED **not** to review the Neighbourhood Plan prior to the adoption of the Local Plan in 2020/21 and that, after that adoption, the Town Council should investigate the possible need for and means of a review’.*

3.6.3 The MWTC minutes show it chose not to review the MWNP ahead of the Local Plan. This is logical though also indicates it would not undertake any engagement with the community.

The lack of engagement with the community through and by the MWTC is discussed further in Section 2.

3.6.4 However, we must note here that SC seems to have used this decision to justify it imposing without consultation a single site solution to development in Much Wenlock; ‘As things stand it is understood there is no intention from the Town Council to undertake a full review of the Neighbourhood Plan.’ (SC Cabinet, 14th Dec 2020; response to Public Questions). This is both untrue and illogical. The MWTC has agreed it would consider a review in the light of the new Local Plan. SC ignores the MWTC’s subsequent decision not to support the 120 house site and also national planning guidance in respect of not overriding local policy established through neighbourhood plans. This is addressed below.

3.6.5 Shropshire Council’s whole approach throughout the LPR has been to claim it will practise open and continuing engagement with the community but in practice it has done no such thing. It has not organised or attended any events, whether face to face or virtually. When it has received comments and suggestions of alternative approaches it has failed to engage in discussion. It is, therefore, clear that the LPR Reg 19 process has not been undertaken in a way which fulfils even SC’s own commitments of meaningful community consultation. That is, it is not compliant with legal requirements and legitimate public expectations and is accordingly unsound.



3.7 Finally, the Govt expressly wishes to; “move the democracy forward in the planning process and give neighbourhoods and communities an earlier and more meaningful voice in the future of their area as plans are made, harnessing digital technology to make it much easier to access and understand information about specific planning proposals. More engagement should take place at the Local Plan phase;” ; see page 18 of Planning for the Future (MHCLG, White Paper August 2020);

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf))

**b. Failure to consider relevant evidence (including significant community feedback), the legally made Much Wenlock Neighbourhood Plan, and setting aside national policy including that of the function and importance of Neighbourhood Plans.**

4.1 The NPPF (paras 35 and 36) states that plans are ‘sound’ if they are;

- i. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs
- ii. Justified – an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence
- iii. Effective – deliverable over the plan period and based on effective joint working and
- iv. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Shropshire Council’s LPR fails these tests. It has imposed a solution on Much Wenlock that is unsound because:

1. By ignoring the ‘made’ MWNP, it has not been positively prepared and runs counter to national guidance



2. SC has not suggested an appropriate strategy and has not considered reasonable alternatives; rather it has simply imposed a single large housing site without consideration of the implications Annex 2b (i) Annex 2b (ii)
3. It does not take into account the evidence that current policy approaches are effectively delivering housing and can readily do so until 2036 even with the increase to the target Annex 1b (iv)
4. It does not meet objectively assessed needs as described in the MWNP, the Much Wenlock Area Place Plan and supporting evidence Annex 2d (i)
5. It is not consistent with national policy as it ignores and misinterprets NPPF guidelines on strategic and local issues
6. SC proposes a solution which will not deliver sustainable development because of the lack of investment in necessary infrastructure and ignoring alternative options which would contribute positively to both sustainability and climate change
7. By ignoring SC's own Flood Risk Strategy (2015) and the Government's up to date National Flood and Coastal Erosion Risk Management Strategy for England, this will continue to lead to significant flood risk and lack of resilience for the whole community

#### **4.2 Not positively prepared: Ignoring the 'made' MWNP**

Shropshire Council's unwillingness and inability to fulfil its obligations for community engagement is compounded by the fact that it has ignored, without justification, the policy context and information set out by the current statutory Much Wenlock Neighbourhood Plan (MWNP). The MWNP is the expression of the community's expectations for the type and scale of development for the town to 2026. The MWNP was supported by 84% of residents in the referendum of 2013 and was 'made' by Shropshire Council in July 2014. The MWNP sets out policies on the scale, size and type of development that the community wishes to endorse.





4.2.1 SC claims in the LPR Reg 19 (2.17, p 8); *'The policies and proposals within adopted formal Neighbourhood Plans which conform with the Shropshire Local Plan 2016 to 2038 will also continue to apply'*. Yet SC has dropped – without explanation - key policies in the MWNP that would shape the location and style of development. It's 'support' for the MWNP is clearly an afterthought and this attitude was established in SC's Cabinet paper (on the LPR) of January 2017 which did not mention Neighbourhood Plans and their relevance, describing it as an 'unfortunate oversight'. See copy email from SC, 16<sup>th</sup> Jan 2019 in Annex 1a (i) p3-4.

4.2.2 However, it is very interesting to note that the same Cabinet paper did mention the MWTC Housing Report put forward by the MWNP Monitoring Group in 2017;

*'The Town Council recently commissioned a review paper (March 2017) to examine the delivery of housing in the context of the existing Local Plan guideline. The report concluded that new housing has been delivered at or slightly above the anticipated rate and there was no need to modify the housing policies and approach set out in the existing Neighbourhood Plan'. Annex 1a (ii) p 6*

4.2.3 In other words, less than three years ago it was agreed that housing policies in the MWNP were appropriate and the policy approach set out in the MWNP was succeeding. SC's understanding of Much Wenlock's housing needs has been sadly neglected in the interim time between then and now. The LPR Reg. 4. Development Management Policies (p75) states at Item '2;

*On sites of 5 or more dwellings:*

*a. In locations where in the last 5 years a Local Housing Need Survey has been undertaken through the 'Right Home Right Place' initiative or an equivalent survey endorsed by Shropshire Council, at least 50% of open market dwellings will reflect the profile of housing need established within the survey.'*



4.3 There has been no recent housing needs survey carried out by SC, the most recent was 2006/7 carried out by the then Bridgnorth DC which informed the evidence base of the MWNP. Additional housing needs survey work was undertaken for the MWNP to inform its policies. The Much Wenlock Refresh Group is the only group to have carried out a recent survey of housing need the results of which can be found on the web site (see.

[https://sites.google.com/view/mwnprefresh/community-engagement-april-2019/narrative-statement-of-the-feedback-received#h.p\\_N-RmXdWXEL7L](https://sites.google.com/view/mwnprefresh/community-engagement-april-2019/narrative-statement-of-the-feedback-received#h.p_N-RmXdWXEL7L)

Shropshire Council's Hierarchy of Settlements report (2017), which is a foundation of the LPR, fails to mention the MWNP as part of the Development Plan for the County:

<https://shropshire.gov.uk/committee-services/documents/s16708/Appendix%20Local%20Plan%20report%20-%20Hierarchy%20of%20Settlements%20Assessment.pdf>

*“1.4. The Shropshire Council Development Plan consists of the adopted Core Strategy (2011); and adopted Site Allocations and Management of Development (SAMDev) Plan (2015). Shropshire Council has commenced work on the partial review of the Development Plan. This Settlement Hierarchy forms part of the evidence base for this partial review by informing decisions on a settlement’s potential to accommodate new development.”*

4.4 Subsequent papers to Cabinet have referenced the relevance of the MWNP in determining the LPR. For example, both the ‘*Shropshire Local Plan Review Consultation on Preferred Scale and Distribution of Development (October 2017) Consultation Period: Friday 27 October 2017 – Friday 22 December 2017*’ Annex 1a(ii) p3-7 and *The Consultation on Preferred Sites (November 2018)* paper <https://shropshire.gov.uk/committee-services/documents/s20250/Appendix%20-%20Preferred%20Options%20Consultation%20Final%20Draft.pdf#page=1&zoom=auto,->

[274,93](#) mention the MWNP as part of the Development Plan with additional notes covering the success of meeting target for developments through the Monitoring Group Report.

The Government's guidance to local planning authorities on Neighbourhood Planning (updated May 2019 and May 2020; <https://www.gov.uk/guidance/neighbourhood-planning--2>) is clear that

*'The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues.....*

*The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. **It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.** This is because [section 38\(5\) of the Planning and Compulsory Purchase Act 2004](#) requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.*

*Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement ([paragraph 65](#) of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an [indicative figure, if requested to do so by the neighbourhood planning body](#), which [will need to be tested](#) at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. **This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.'***

4.5 These strong steers were reinforced by the MHCLG in correspondence with the Refresh Group dated 22<sup>nd</sup> June 2020;

*The Government's expectations for how made neighbourhood plans should be taken into account when local plans are being prepared are set out in planning guidance. It makes clear that where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to. In addition, the guidance also sets out considerations for reaching a view on whether a policy is a strategic policy. In the case of site allocations, this includes whether bringing the site forward is central to achieving the vision and aspirations of the local plan or spatial development strategy.*

4.5.1 Shropshire Council has not taken the key policy directions for development of the MWNP into account. This is contradictory as those same policies are in accordance with SC Local Plan ambitions and include policies about Climate Change and Sustainability, see Objectives 3 and 9, MWNP. In doing so SC has not '*responding[ed] positively to a range of evidence*' (LPR Reg 19, 2.19 p8) as it should. SC has also not explained what change of circumstances apply and the site allocation is clearly not a 'strategic proposal' when the Draft Local Plan (S13) itself only states it will 'contribute towards' growth. The truly strategic sites for development include the major redevelopment of the Iron-bridge Power Station within the Much Wenlock Place Plan area and these are identified separately.

4.5.2 National guidance goes on to set out processes, should there be a significant change to the development boundary:



*Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.* (Paragraph: 106 Reference ID: 41-106-20190509; Revision date: 09 05 2019) <https://www.gov.uk/guidance/neighbourhood-planning--2#updating-neighbourhood-plan>

4.6 However, there has been no discussion, report or assessment as to how the MWNP has been taken into account or otherwise been discounted. Indeed, the evidence and information contained in the MWNP (and its background evidence base) have been effectively ignored by SC in developing its 'preferred option'.

<https://sites.google.com/view/mwnprefresh/neighbourhood-plan>

4.6.1 From our assessment of the SCI, of Cabinet papers and consultation documents and the Place Plan, it seems that Councillors endorsed reports and information which set out the need for extensive consultation and which eventually highlighted the importance of the MWNP. However, they were not subsequently asked to assess and endorse any rationale or evidence that justified setting aside effective current MWNP local policy for the delivery of housing.

4.7 By ignoring key aspects of the MWNP, SC sets itself against national planning guidance that requires local plans not to override the work done by communities in preparing their NPs. Somehow SC interprets the NP for Much Wenlock as only being relevant for influencing details of design; this makes hollow their claim (para 2.29) to work constructively with local areas.

4.7.1 This is doubly mystifying however when the proposals for other key centres are considered (the Settlement Policies S1-18). Much Wenlock's sister settlements of Broseley, Bishops Castle and Cleobury Mortimer are expected to deliver 250, 150 and 200 houses respectively. Each of these places is bringing forward a neighbourhood plan and the Reg 19 Local Plan leaves it entirely to them to decide on the location and scale of development

sites. The contrary approach adopted toward Much Wenlock is not explained (S13). Setting a target for development and then requiring a review of the MWNP to identify suitable location(s) and the type of development would be entirely appropriate. We can only conclude that this would put at risk SC's commercially driven approach to securing planning gain through one negotiation.

4.8 Shropshire Council has taken the view, **without consultation** with the community, that, 'there is a need for the Council to plan effectively for a further 12 years to the end of the new plan period to 2038. In these cases, the Shropshire Local Plan provides a development strategy for these areas' LPR Reg19, 2.30. p 10

Evidence refs for section 1b are:

<https://www.gov.uk/guidance/neighbourhood-planning--2#updating-neighbourhood-plan>

<https://sites.google.com/view/mwnprefresh/neighbourhood-plan>

Annex 2d (ii) p 2-3

#### **4.9 Not justified: Failure to consider reasonable alternative approaches and ignoring evidence**

Similarly, there is no record that alternative strategies for the town were considered or put before Cabinet; see Annex 1a (ii) Annex 2b (i). For example, Shropshire Council has acknowledged a significant flood risk for the whole catchment but not addressed the relationship between this risk, the town, the MWNP policies and the need and location of development. Yet, National Planning Guidance for NPs says that:

*In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in [paragraph 11, footnote 6](#)), which may restrict the scale, type or distribution of development in a neighbourhood plan area.*

*Para 11 (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area <sup>6</sup>*

*And Footnote (6) The policies referred to are those in this Framework (rather than those in development plans) relating to: habitat sites (and those sites listed in [paragraph 176](#))..... and **areas at risk of flooding** or coastal change. ↵*

We deal with flooding in more detail in section 1c below.

4.10 SC's LPR process explicitly prioritises identifying a high level of sites for housing, driven by the requirement (or fear) to find a 5 year supply of housing (see presentation by SC of 3<sup>rd</sup> January 2019). SC has not fully considered the MWNP and its evidence base, the outcomes of monitoring delivery or subsequent information it has received.

4.10.1 Indeed, the current (and effective) policy approach has been effectively ignored by SC in developing its 'preferred option'. For example, SC has ignored the outcomes of the 2017 review of the effectiveness of the MWNP in delivering housing in accordance with the limits/targets set out by the independent Assessor. This review established that the MWNP was and is ahead of its delivery of housing both in terms of numbers and scale of development.

4.10.2 The original 2018 LPR proposal of an additional 20 houses (*over and above the MWNP target/limit of 130*) proposed for 2026 to 2036 (i.e. an increase from 130 to 150) would be of a scale which can be accommodated within the current policy approach. The new Reg 19 Draft Local Plan proposes a further 50 or more houses with the bulk of these being built out quickly on a single large site; this goes against both the evidence base and the agreed policy direction. SC has not presented any new evidence to suggest that the current policy approach or allocation of a small site(s) would be wrong. If current annual rates of development of 18 per year between April 2016 and 2018 as reported to the community by Adrian Cooper, Planning Policy & Strategy Manager, SC at the only face to



face public meeting on 3<sup>rd</sup> Jan 2019, were to continue until 2038, Much Wenlock would experience substantial over-development. See *Annex 2b (iii) p 4 and 9 and Annex 2d (ii) p6*; <https://drive.google.com/file/d/1BdDRtPs-6jqxRAdwfqC8emGyNF8IVPOb/view>

4.10.3 The LPR Appendix 5: Residential Development Guidelines and Residential Supply, Schedule A5(i): seems to be at odds with Planning Policy managers statements to the community as it describes a scenario of only 12 dwellings per year until 2036. A target which it has been shown that the policies set out in the MWNP can deliver.

4.10.4 In policy making terms, the LPR has not proposed to formally change the overarching policies of the Core Strategy and the MW Neighbourhood Plan which is for 'limited development to meet local needs'. The MWNP, page 8, states that large-scale development is not acceptable to the community and where new housing is needed the consensus was that it should be delivered through smaller sites. The MWNP sets out clear policies that reflect the community's overwhelming desire to maintain the scale, style and setting of Much Wenlock and surrounding countryside from development.

4.10.5 Yet, the LPR Reg 19 proposals have ignored this policy requirement by imposing a single large site. There is no reason stated for the choice of location and scale of MUW012VAR as a single large development site. The only and weak explanation we can find for the choice is in SC's site assessment document and in Adrian Cooper's presentation of January 2019 that the development would create gain to pay for flood alleviation at no cost to SC. There is no record that alternative strategies for the town were considered or put before Cabinet.

4.10.6 There is likewise no clear reasoning at how target figures are arrived in a way which will meet local needs and retain scale style and setting of the rural market town which is Much Wenlock. With the lack of consultation, the community at large has been given no acceptable reasons why the target of development should be raised to 200 for 2016 to 2036/8.





4.11 In terms of the type of development, the LPR does not stipulate how the proposed development of 120 houses on MUW012VAR will meet local housing needs.

On the other hand the MWNP Refresh Group has established a workable set of alternative and sustainable options to deliver small -scale sites that would meet the currently suggested target of 165-200 dwellings until 2038. These would meet all of the requirements of DP1 Residential Mix and the established needs of the community both young and old.

4.11.1 We do not suggest imposing these on the community as they should be considered by all of the community through a Review of the Neighbourhood Plan. This can consider the relative merits of potential sites (such as those identified by SC at MUW001 MUW002 and MUW008). Some of these options are considered in Annex 1; '*Much Wenlock – Options for Sustainable Development*'.

4.11.2 SC has also not taken into account previous findings from local plan inquiries which have dealt with this issue. The Inspector's report into the Bridgnorth Local Plan in 2006 concluded that a large housing development on a part of the same site as suggested by the LPR (MUW 0012) would have a significant impact on town's economy through a negative effect on the town's tourism trade. This would add to congestion and undermine the viability of the High Street shops for residents. *See Annex 2d (i) p4*

4.12 No evidence has been put forward by Shropshire Council that the policy approach taken by the MWNP is failing or will fail to deliver appropriate levels of development. If a housing site or sites are required (and we recognise that an allocated site would be expected under recent national policy guidelines) to deliver the suggested 165 or 200 houses expected in Much Wenlock from 2016 to 2038, then the community can discuss this through a review of the MWNP following the Examination in Public. The effectiveness of the neighbourhood planning process to achieve this in Much Wenlock was demonstrated in 2011-13 when a site was allocated. This site was withdrawn by the developer/landowner at



the last minute as they considered too small a site to be commercially viable due to the company's own particular development model.

4.12.1 As well as closing its mind to the effectiveness of the current approach of the MWNP, SC has ignored positive alternatives put forward by the community which would be in line with letter and spirit of the MWNP. The revised NPPF (paras. 65, 68 and 69) asks local authorities to set a strategic target for neighbourhood areas and then steers neighbourhood plans to positively plan for and deliver small to medium sized sites.

4.12.2 Shropshire Council (in an email from Adrian Cooper dated 15<sup>th</sup> April 2019) refused to countenance the possibility of smaller sites delivering CIL and affordable housing, assuming the choice would be between very small infill and a single large development. By its content the email simply refuses to enter into a meaningful discussion with the community about options. The email also explicitly contradicts national planning guidance that the emerging local plan must **not** override the MWNP.

4.12.3 The only public engagement on the LPR has been undertaken on a voluntary basis by the Refresh Group; this has been through two events in April 2019, a continuing dialogue through its website, Facebook and Twitter as channels of communication and a leaflet circulated to all households in August 2020. The overwhelming response was to reject the LPR 'preferred option'. This feedback and further evidence researched by the Refresh Group identified alternative development policy options consistent with the MWNP. This feedback has, to date, been ignored by SC and the MWTC.

4.13 In particular the Group's 'Certainty and Delivery' paper has set out clear alternative options for the achievement of additional development and addressing infrastructure needs.

<https://sites.google.com/view/mwnprefresh/local-plan-review>

It is also important to note that all of the requirements of the NPPF have to be considered to deliver sustainable development. It is **not** just about securing a 5 year supply of land.



SC's LPR proposals for Much Wenlock are set in the context of the Much Wenlock Place Plan that purports to describe a functional area for addressing development and infrastructure needs. In parallel, the LPR has identified a number of [truly] strategic sites for major development. One of these is the Ironbridge Power Station (IPS) and which is located within the Place Plan area and literally on the doorstep of the Much Wenlock town/parish boundary. This scheme will deliver 1000 houses and associated development in the Plan period.

4.14 Whilst Much Wenlock is designated a 'key settlement' and can be expected to accommodate some development and so requires a development level or target to ensure development levels can be managed. However, the scale of the IPS allocation is highly relevant to the need for further development in or around the town. In particular, it is not necessary to impose a single large site because of fears of the Place Plan area not making a sufficient contribution to a 5 year supply of land.

4.14.1 Indeed, as we show in this submission, there is a great risk – expressed by many residents - that the large development at the IPS will generate significant detriment to Much Wenlock as a result of increased traffic flows along narrow and unsuitable roads within the Conservation Area.

4.14.2 The risk of significant overdevelopment in the Place Plan area and the town is high. Indeed, if Much Wenlock were to have a single large housing site imposed upon it at every 5 year review of the local plan, by 2038 we can readily estimate an increase in the size of the settlement twice SC's current target level of a further 200 houses. The distinctive character of the town would be irrevocably damaged.

4.15 SC has justified the single large site allocation at MUW012VAR because it can be developed quickly and so is necessary to ensure that Shropshire does not come under pressure to release other land which creates poor planning outcomes (*see 3<sup>rd</sup> January 2019 presentation by Adrian Cooper*). If SC had taken time to properly consider the MWNP and

the other options available, it would have realised that the imposition of the single large site *is* the poor planning outcome.

4.15.1 SC's singular approach to Much Wenlock in the LPR Reg19 has been to find a single large site which can be developed quickly. We can note at this stage that SC's weak understanding of the circumstances of the town and its development potential has been further exposed by the proposals put forward by the owner of the MUW012 site. The original preferred option of 80 houses has been deemed unviable by the landowner, despite, we may surmise, that the 80 or so house development fits a commercial model and was that given to SC to enable them to 'fix' the existing flooding problems.

4.15.2 The [more recent] 120 house proposal clearly contradicts the [as yet unexplained] assessment by SC that the 'preferred option' at 80 houses would be the best planning solution. No reason has been given for the sudden jump from a 150 dwelling to a 200 dwelling target nor from a 80 dwelling site to a 120 dwelling development. Indeed, aside from commercially driven reasons, it is entirely illogical to allocate a large site of 120 houses; which would be developed quickly by 2026, so making the MWNP redundant. This cannot be the intention of national planning guidance or SC's own support of the MWNP in 2014.

See link here to the Housing Report by the MW Refresh Group;

<https://sites.google.com/view/mwnprefresh/themes/housing>

4.16 We can also note the recent findings by the Inspectorate about the lack of soundness of the St. Albans District Plan because **the preparation of the plan was not in accordance with the council's statement of community involvement**. Similarly, the recent decision by Uttlesford DC (30th April 2020) to withdraw its local plan was made because the Inspector found it unsound on the basis of not considering alternative approaches when assessing the impact of its preferred option. The positive and mature response of the local authority to revisit its plan making in close consultation with residents is also noteworthy and

encouraging for good practice; [https://www.theplanner.co.uk/news/uttlesford-withdraws-local-plan?utm\\_source=Adestra&utm\\_medium=email&utm\\_term=](https://www.theplanner.co.uk/news/uttlesford-withdraws-local-plan?utm_source=Adestra&utm_medium=email&utm_term=)

#### ***4.17 Not effective: Balanced Growth and Infrastructure not deliverable over the Plan period***

**Balanced Growth:** Addressing Employment Land Supply and Delivery, the Shropshire Local Plan Review Consultation on Preferred Scale and Distribution of Development (October 2017) report <https://shropshire.gov.uk/committee-services/documents/s16707/Appendix%20Local%20Plan%20report%20-%20Preferred%20Options%20Consultation.pdf> , lays out the policy objective for achieving ‘balanced growth’ between housing and employment development. Para. 3.18 states that *“To achieve this ‘balanced growth’, it is proposed that around 300 hectares of employment development will be required in Shropshire. There are already substantial commitments totalling 223 hectares (sites with planning permission or allocated within the SAMDev Plan) and this will help to ensure that sufficient land will be available from the outset”.*

4.17.1 No mention is made in this report of the MWNP and its allocated employment site. SC must appreciate that the land at Stretton Road has been allocated in the former Bridgnorth Local Plan and yet has not been brought forward in any way since this allocation (20 years previously) and subsequently in the MWNP. SC’s ability to achieve its ambition of ‘balanced growth’ cannot be achieved unless there is a positive proposal to service and market the site.

4.18 This is not considered by or proposed within the LPR Reg 19 and, to our knowledge, SC has not attempted to bring the site forward for development. Appendix N: MW Place Plan site Assessments (August 2020), S13.1 identifies 2 hectares of employment site MUW011. This site provides only 0.61 ha. The MW Place Plan identifies the employment site within Priority A but this has not been costed and its delivery has been being delegated to SC’s proposed Business Park Programme 2021-36. On searching for the said document, it seems



the full Shropshire Council approved it on the 17<sup>th</sup> December but there is no public access; it has clearly not been made available to the community or been part of any LPR consultation.

4.19 Additionally and in contradiction of the policies for balanced growth, SC imposes a strategic corridor to run through Much Wenlock with the implication of dormitory growth dependent on private car transport ( LPR Reg19 SP 14 pp.63-5).

**4.20 Infrastructure investment:** There is recognition in the LPR consultation documents that there are significant infrastructure issues for Much Wenlock. Necessary investment is required in health services, public transport, traffic impacts through the Conservation Area (especially at the Gaskell Corner), the under-provision of recreation facilities etc. This is especially relevant for Much Wenlock as the Government's guidance to local planning authorities (updated May 2019 and May 2020; <https://www.gov.uk/guidance/neighbourhood-planning--2>) states that

*Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see. To help deliver their vision communities that take a proactive approach by drawing up a neighbourhood plan or [Order](#) and secure the consent of local people in a referendum, will benefit from 25% of the revenues from the Community Infrastructure Levy arising from the development that takes place in their area, where their authority collects contributions using this method.*

4.21 The Place Plan lists the infrastructure frailties that Much Wenlock experiences but, as with the LPR Reg 19, no positive or defined plans or proposal are being put forward for the necessary infrastructure improvements for the town. The only commitment to infrastructure delivery is a proposal in SC's *Infrastructure Funding Statement (December 2020;*

<https://shropshire.gov.uk/media/16849/annual-infrastructure-funding-statement-2019-20.pdf> ) for

resolving the flood risk issues at Hunters Gate to protect 39 properties;

*“Much Wenlock and surrounding area - Infrastructure project: Flood Risk Management Infrastructure at Hunters Gate (Much Wenlock): An infrastructure scheme is included in the Environment Agency’s current 6-year programme (for delivery by 2021) for Hunters Gate to protect around 39 properties. The scheme is being developed and delivered in partnership with Severn Trent Water. The scheme could help to alleviate flooding and increase resilience in the centre of the town”.*

This is welcome but oddly contradictory to Policy S13’s reliance on a commercial development .

4.21.1 The only firm infrastructure proposal in the LPR 19 is for a roundabout on the A458. However, it is clear that this is only necessary to meet highways standards required for a 120-house development; this has not been identified as necessary in the Place Plan, it has not been requested by the community and nor has it been identified previously by SC as a highway improvement priority. If traffic calming is necessary on the A458, it is arguable whether a roundabout is the best and most cost-effective way. If priorities are to be considered, wider traffic management of the highway network around the town and the ‘pinch-point’ of the Gaskell Corner is recognised as the most concerning especially as it has now been designated for inclusion in a Strategic Corridor (LPR Reg19 SP 14 p p63-5).

4.22.2 A crucial and strategic infrastructure issue for Much Wenlock that must be addressed in the LPR is the deliverability of an approach to reduce risk to life and property from surface water flooding for the whole town. It is not considered by the LPR and we consider this more fully in section 1c below.

**4.22 Not consistent with national policy: Contrary to national guidance and support for neighbourhood plans and imposing non-strategic proposals**

National Planning Guidance for Neighbourhood Plans (para 9) makes it clear that it cannot be tenable or consistent with national policy intentions that SC can, under the guise of a 5 year review, simply ignore and ‘overturn’ the clear policy approach to development set out in



a made NP. The MWNP has a policy horizon to 2026 and the principles underlying its policies have not been challenged by SC as irrelevant toward the longer time horizon of 2036.

4.23 Ministers have been clear that Neighbourhood Plans should be critical in shaping how planning decisions are made; Minister Barwell said towards the end of the [Neighbourhood Planning Act 2017] Bill's passage: ***"We want to ensure that this process helps people who give up their spare time and put effort into producing neighbourhood plans to get the result they want in terms of how their local community develops."***

Please see source; <https://lichfields.uk/blog/2017/may/11/neighbourhood-planning-act-2017-essential-guide-to-future-changes-to-development-management/>.

4.23.1 The (then) Clause 1 was about giving communities the confidence, through legislation rather than guidance, that their neighbourhood plans "will get proper consideration in planning decisions, where the plan is material to the application" ***because the hours communities put in to preparing them should be "recognised in the system at the earliest possible opportunity"***.

4.23.2 Recent correspondence received from the current MHCLG Minister by the Refresh Group in 2020 fully re-affirms the importance that the Government attaches to neighbourhood plans. This raised further fundamental questions about the way SC has considered the LPR in ignorance of the MWNP. Annex 1b (i)

4.24 A 5-year review by the local planning authority is perfectly entitled to review the housing needs and requirements of its whole area but it cannot be an excuse for simply overturning the 'time and effort' to suggest a result which is contrary to the ambitions of the community, which, unless SC has evidence to say otherwise, remain the same.

4.24.1 In particular this applies to the imposition of a specific site allocation under the guise of a 'strategic approach'. There is nothing in the LPR's proposals for Much Wenlock which is



strategic. SC has made an incorrect interpretation of National Policy. It has interpreted its role as defining a site rather than setting a strategic objective or evaluating a range of options or integrating development with the town's strategically assessed infrastructure needs. SC has also not set out reasons for setting aside the key policies for Much Wenlock.

4.24.2 The NPPF (paras 20-23) says that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial developments;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

*Strategic policies should be limited to those necessary to address the strategic priorities of the area, to provide a clear starting point for any non-strategic policies that are needed.*

*Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.*

4.24.3 Para 23 in particular says that the plan should identify only broad locations for development and provide a clear strategy for bringing sufficient land forward, and planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).



4.24.4 The LPR Reg19 clearly steps outside the guidance in the NPPF. It has not considered a strategic solution but simply allocated a site for convenience and ease of delivery. The NPPF clearly anticipates that neighbourhood plans especially will be the mechanisms for site allocations.

4.25 The 'preferred option' site cannot be considered 'strategically important' for Shropshire, Much Wenlock, as a settlement, is considered suitable only for 'limited development to meet local needs'. The MWNP is the tool to identify particular non-strategic issues such as the location and delivery of the limited new housing required to support the 5 year land supply and, more importantly, to meet those local needs.

4.25.1 The NPPF affirms this in paras 28-30: *Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies. In particular, 'Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies'.*

4.26 The contrast with SC's advocacy for the redevelopment of the Ironbridge Power Station as a strategic site for the county is notable. At 1000 houses, this development does have strategic importance and has wide-ranging implications. This is especially relevant for Much Wenlock; as noted above the site is in the Place Plan area (a building block for the LPR) and is physically on the doorstep of the parish. In terms of housing numbers, it reduces the need for MW to provide additional housing. In terms of the traffic flows, the IPS development

could, without proper strategic highways responses, have significant detrimental impact. SC has not put forward mechanisms for addressing the known traffic and highways issues.

4.26.1 The preferred option' for Much Wenlock is also put forward contrary to SC's own adopted policies for the location of new development. It ignores the important need for proximity to shops and community facilities, open space for recreational purposes, and reduction in car use. The current 'preferred site' MUW012VAR does not meet the LPR's policy criterion SP2 Strategic Approach p13;

*1. Shropshire will flourish, accommodating investment and new development that contributes to meeting needs and making its settlements more sustainable. New development will be supported by necessary infrastructure and be of a high-quality which positively responds to its setting, local needs and our changing climate.*

This is more fully addressed in section 2 of this submission.

### **1c. Flooding and the Rapid Response Catchment – lack of a strategic catchment-wide approach and failure to meet national policy**

#### **5. (i) Setting**

5.1 Much Wenlock lies within a designated Rapid Response Catchment at risk of serious surface water flooding. The site now identified as the 'preferred option' is proposed for the building of 120 houses on land that was in 2015 identified to residents by the Environment Agency, on data provided by Shropshire Council, as one of the areas of the catchment of Much Wenlock most at risk of flooding.

5.1.2 The high risk designation of the overall catchment is a reflection of the location of Much Wenlock, which stands at a height of 150 metres within a large bowl with surrounding hills rising a further 50 metres. The entire area is drained to the north by a single stream. This

falls steeply over 100 metres via a lip on the northern side of the bowl and through a narrow valley to the River Severn. This elevated setting is quite unlike that of any other Key Centre in Shropshire.

## **(ii) Environmental context**

5.2 The unusual physical setting and hydrological catchment are greatly influenced by the local geology. Beds of permeable limestone lie above and below relatively impermeable beds including shales. On the western side of the town the geology is consistent. The dip slope of the limestone Wenlock Edge falls towards the built up area, where it is overlaid by the Ludlow shales of Hopedale. Here two semi-permanent watercourses, one a tributary of the other, lie in identifiable valleys. These have provided the opportunity for the recent construction of two flood attenuation ponds beyond the limit of the built up area.

5.2.1 The preferred site MUW012VAR lies on the south eastern perimeter of the town where the geology and hydrology are less well defined and less well understood. Despite recommendations in reports on flooding in this area no attenuation measures have been implemented. Not least among the limitations in producing flood attenuation solutions has been the absence of any even semi-permanent watercourse.

5.2.2. Crucially, MUW012VAR, on the eastern side of Much Wenlock is not below any established and identifiable water course across which to construct an attenuation feature. The intermittent but serious flooding on the site derives mainly from sub-surface groundwater flow which, during flood events, creates a temporary but very active spring line. Moreover, the geology, upon which the groundwater movement originates, is considerably more complex and less well understood than that along the dip slope of the Wenlock Edge.

## **(iii) Flooding and flood investigation**

5.3 There has been a long history of flooding in Much Wenlock, usually occasioned by protracted periods of, not always heavy, persistent rainfall. The rapid increase in the built up area of the town since WWII has inevitably produced more runoff and greater dangers from



flooding. Extensive flooding in 2007 provided a serious wake-up call. The 2015 designation of a Rapid Response Catchment by the Environment Agency identified 380 homes at risk of flooding and warned of a potential risk to life.

5.4 Since the serious flooding of 2007 there have been numerous reports commissioned and carried out by different groups. The earliest was a strategic assessment for Shropshire Council in 2007 by the Halcrow Group. In 2009 two further reports were published. The first, in the spring, was produced by a very active group of local residents. Later in the autumn a further report was produced by the Engineering Services team of the Telford and Wrekin Council. These three reports had one thing in common, they added to the analysis but provided no certainty about solutions.

5.5 In June 2011 Mouchel produced a report commissioned by Shropshire Council with the title the “*Much Wenlock Integrated Urban Drainage Management Plan*”. Those producing this report made good use of the evidence from earlier reports and had the great advantage of being able to make recommendations to a responsible authority.

5.5.1 The major recommendation, among several options, was that attenuation ponds be built on the western side of the town (subsequently completed) and that farming practices should be improved. However, the report also included a cautionary warning that such a single option “*does not improve all flooding issues.*” Among other recommendations was a scheme to build two small attenuation ponds to the south of the town, above site MUW012. One was to be constructed close to the cemetery, and the other across the A458 close to the Primary School. Neither of these was constructed. The report also noted in respect of the area around site MUW012VAR that “*...flooding mechanisms are still not completely understood, so it is recommended to continue to improve understanding of the issues...*”

5.6 In the light of this lack of certainty it is difficult to understand the response by SC to place the complex and difficult task of flood alleviation into the hands of a single developer.



Following the investigation and cautionary report from Mouchel a further more limited investigation and report was prepared by Richard Allitt Associates. This work was commissioned by Severn Trent which had already adopted the drainage system on Hunters Gate, the site immediately adjacent to MUW012VAR. It aimed specifically to examine the reasons for the substantial flooding which had occurred in 2007 and had threatened to arise subsequently on Hunters Gate. This report to Severn Trent in 2015 was also made available to Shropshire Council. It identified several causes of the flooding on Hunters Gate. Among them was an excessive flow from the drainage of the A458 and excessive runoff from site MUW012VAR causing an overload of the drainage system of the development.

5.7 The flooding from Hunters Gate was then recognised as putting undue pressure on the town systems as well as the flow out of the bowl down to the River Severn. LPR Reg 19 DP21 (p130) Flood Risk 1a and b says;

- 1. Development proposals must show how they have applied the Sequential Test in areas known to be at risk of any form of flooding now or in the future*
- b) Where the proposed location of the development would increase flood risk elsewhere.*

5.8 The sequential test has not been applied by SC in preparing their plan. There has been no evidence presented to the community that a single developer will guarantee 'no risk' to the homes downstream of Much Wenlock and into the catchment area of the River Severn.

5.9 The Much Wenlock Civic Society has been among those pressing Severn Trent and Shropshire Council to remedy the continued risk of flooding from site MUW012 onto the adjacent properties in Hunters Gate. A letter from Severn Trent to the Civic Society and dated 2<sup>nd</sup> March 2015 formally recognised the need for remedial action. It stated "*In recognition of the flood risk to Hunters Gate we've submitted a joint bid with Shropshire Council to DEFRA for funding for a scheme to reduce flood risk.*" This bid has not been made available for public scrutiny and, while it is noted in the SC's Infrastructure Investment Plan, no subsequent action has been taken or plans for action confirmed.



#### **(iv). The LPR's proposals in context**

5.10 In January 2019 Shropshire Council revealed development plans to build 80 houses on site MUW012, which they had identified as the “preferred option” through their review of the Shropshire Local Plan. No prior intention to remedy the existing flood problems on Hunters Gate was intimated. The plan was supposedly intended to remedy the existing flooding as part of the development. This was allegedly to be achieved by the construction of an attenuation pond as outlined on the initial plans. The proposal gave rise to strong local opposition as it failed to comply with the policies of the Much Wenlock Neighbourhood Plan. It also failed to reflect any of the recommendations of the several investigative reports mentioned above. Not one of these reports recommended that the known flooding problem in the area would or could be ameliorated or eliminated, rather than increased, by building more houses.

5.11 By 2020, apparently after further investigation of the site, the developer, supported by Shropshire Council, proposed to extend the site and to build no less than 120 houses. It was claimed that the investigations had revealed addition costs for flood alleviation. The additional houses would be required in order to fully defray these alleviation costs. Further, more detailed plans of the supposedly enhanced flood alleviation scheme were not made available for public scrutiny prior to this consultation.

5.11.1 On February 16<sup>th</sup> 2020, after a period of prolonged rainfall, a large pond appeared and spread across a substantial part of site MUW012. No stream appeared and the pond was visibly being created by groundwater springs. The direct flooding of many properties was avoided by a wall constructed by a resident to guard against the risk of the flooding of his home from site MUW012. However, other low lying properties on Hunters Gate were flooded when groundwater rose through their hung floors.

#### **(v) Compliance with National Policies**



5.12 At the county or strategic scale, in accordance with paragraphs 155 to 158 of the NPPF and the national Flood & Coastal Erosion Risk Management Strategy (see below), there is a strong argument that all major development proposals should be directed away from the town altogether on the basis of the high risk of flooding. At a minimum, a substantially updated, coherent and comprehensive strategic flood risk assessment is required by national policy. This needs to be undertaken anew, in the light of improved local first hand evidence, prior to the consideration of any viable site allocations.

5.13 The evidence from previous events already indicates that building 120 new houses on a site regularly liable to flooding will inevitably add to flood risk in times of prolonged rainfall. On those very rare occasions when flash flooding occurs, a situation not experienced in recent decades, the consequences would potentially be very much more serious. Currently it is proposed that the task of securing the community from flood risk is to be delegated to partial and limited proposals, lacking any transparency, from a single landowner and commercial developer. This is unacceptable. The situation demands that options and solutions should be identified, agreed and funded quite separately in advance of the consideration of further development in this area.

5.13.1 SC has emphasised flood management benefits as the rationale for the large single site as the best planning solution for the town. In the following paragraphs we highlight the shortcomings of SC in its role as a flood risk management authority against its legal obligations to follow the requirements of national flood risk strategy.

### ***National Flood and Coastal Erosion Risk Management Strategy for England***

5.14 The LPR and the 'preferred option' further fails the test of according with national policy and guidance when considered against the National Flood and Coastal Erosion Risk Management Strategy for England (2020);

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/899498/National\\_FCERM\\_strategy\\_for\\_England.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/899498/National_FCERM_strategy_for_England.pdf) .



One of the 3 ambitions of the Strategy is to ensure '*A nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action*'.

5.14.1 There is a clear steer in this toward taking an inclusive approach with people and communities to enable wider understanding and commitment. Place-based decisions, the wider benefits of working with natural processes and natural flood management and taking adaptive approaches are all preferred. £2bn has been made available to facilitate engagement of local people. There are a number of references that are especially relevant for Much Wenlock and the LPR;

*'Risk management authorities will work with partners to: deliver practical and innovative actions that help to bolster resilience to flood and coastal change in local places; **make greater use of nature-based solutions that take a catchment led approach to managing the flow of water to improve resilience to both floods and droughts;** maximise opportunities to work with farmers and land managers to help them adapt their businesses and practices to be resilient to flooding and coastal change; develop adaptive pathways in local places that equip practitioners and policy makers to better plan for future flood and coastal change and adapt to future climate hazards.'* (p13)

5.15 Other references require that SC, as a risk management authority, should work in partnership, share expertise and engage with communities to help them understand and prepare for flooding and coastal change (p29).

5.15.1 The Strategy acknowledges neighbourhood plans (p26) as a place-based approach and sets out communities as an integral part of the approach to 'Place Making'. Page 46: Improve Place Making: Making The Best Land Use And Development Choices To Manage Flooding And Coastal Change - Communities, planners and land managers making the best land use and design choices for development and infrastructure to manage the damages from flooding and coastal change. This includes making space for water to manage risk and

support wider environmental benefits. And on p47 '*Local people and local partners should be at the heart of making local choices*'. On p45 it reinforces the message that risk management authorities will make greater use of nature-based solutions that take a *catchment led* approach to managing the flow of water to improve resilience to both floods and droughts.

5.16 The Environment Agency is currently developing a new National Flood Risk Assessment that will provide a single picture of current and future flood risk from rivers, the sea and surface water, using both existing detailed local information and improved national data. The new risk assessment will be available as open data and will provide risk management authorities, infrastructure providers, insurers and members of the public with more accessible and trusted data and information for making good investment decisions (p33). This would be a strong input to a review of the MWNP and could form the basis for adaptive pathways and a better planning solution.

5.17 Furthermore, the Strategy asks (p70) risk management authorities, such as lead local flood authorities, to provide advice to planning authorities on how long-term, adaptive approaches for flooding and coastal change can inform spatial plans and growth strategies.

5.18 In short, SC should be advising and working with the community through its neighbourhood plan on the long-term rather than driving through limited, site based and short term solutions.

5.18.1 Whilst, on p95, it states that risk management authorities need to ensure ***that people and places are at the heart of local decision making***, they also need to invest in the engagement skills needed to take a more inclusive approach to the future challenges flooding and coastal change present.

Under the Flood and Water Management Act 2010, Shropshire Council, as a risk management authority, is expected to exercise its flood and coastal erosion risk

management functions consistently with this Strategy. Shropshire Council has simply not done this.

5.19 Other Defra announcements on flood risk are extremely relevant to the LPR choices (see <https://www.gov.uk/government/news/building-flood-defences-fit-for-the-future> ). This represents a change to the way funding will be allocated for flood defence schemes, including a priority for:

- **a new risk category which will enable schemes that prevent surface water flooding to qualify for more funding**
- updated payments to account for inflation and based on new evidence on the overall impacts of flooding, such as mental health
- increased payments for flood schemes which also create a range of environmental benefits
- more funding for flood schemes which also protect properties that will later become at risk of flooding due to climate change
- more money for flood defence schemes that help to protect critical infrastructure such as schools, hospitals, roads and railways

5.20 Much Wenlock as a rural and rapid response catchment does provide some opportunities to apply natural flood management measures and indeed two attenuation ponds and some minor planting schemes have been implemented. There is an increasing body of evidence of the effectiveness of natural flood management including the Pont Bren Scheme, undertaken and subsequently monitored by Centre for Ecology and Hydrology and the University of Wales Bangor. The following are illustrations:

- <https://www.woodlandtrust.org.uk/publications/2013/02/pontbren-project-sustainable-uplands-management/>
- <https://gov.wales/pontbren-project-report>



- <https://e-voice.org.uk/wenlocktreeforum/flood-prevention/>

and the Slow the Flow work done by Shropshire Wildlife Trust in Corvedale, as a prevention measure to severe flooding in Ludlow and their commitment to catchment area planning.

- <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9>

5.20.1 Contour maps studies have been produced by SC to highlight the most effective locations for shelter belt tree planting around Much Wenlock. However, this approach has not been considered by the Council. NFM and other nature based solution measures could readily be part of a comprehensive approach to the town and could help inform the best location for, or the design of new development.

5.21 These policy and funding steers from national government present SC with both a requirement to reconsider the LPR and its 'preferred option' and with a real opportunity to fund and follow a catchment wide approach that can be integrated with the MWNP.

5.21.2 SC's Infrastructure Investment plan commitment should be re-affirmed and therefore ask EA/Defra to make available funding as a matter of some urgency through its new 6 year rolling programme. Much Wenlock is a place to explore innovative and integrated solutions. Part of SC's motivation for encouraging the LPR option to be developer-led has been to ensure that the design and study costs do not fall upon its own limited budgets. This funding would alleviate SC's concerns and it may even be possible to convince the MW Town Council that it should use its reserves to help fund a study which is of vital importance to the future of its electorate.

5.21.3 This would enable SC and the community of Much Wenlock to take advantage of the additional funding and support and thence to address the catchment as a whole, rather than the clearly partial and limited approach being promoted by the landowner through the LPR. This could be with a specific ambition of resolving the tension between flooding and further development for the long term. It can be done in a structured way that leads to a shared



understanding of all of the factors which create the risk associated with the rapid response catchment e.g. landscape, geology, land use and land management. This would enable trust to be built between local authorities, landowners and the community, which in turn can lead to a community-wide acceptance of the risks, confidence in potential solutions and the role and best location of new development. Additionally, Shropshire and Much Wenlock would have the opportunity to demonstrate national good practice by integrating the flood risk with the MWNP, connecting development, land management and wider community benefits to enhance resilience.

5.22 We may also note that the Environment Agency has, in response to the overwhelming flood events of the winter/spring of 2020, been asked by Government to bring forward a whole catchment approach to the River Severn. We understand that Shropshire Council is also working with the EA and other authorities in the River Severn Partnership on a NFM and Green Finance-driven proposal for solving the serious flood and water management issues found in the Severn catchment. This is aiming to deliver 'sustainable growth' and has the support of MPs and multiple public agencies throughout the catchment. The MW rapid response catchment is a single but important contributor to the flooding problem; as well as the immediate risk to life and property in the town, it affects multiple properties and people downstream along Farley Brook and discharges just upstream of Ironbridge.

#### **1d. Transport and Accessibility Summary**

6.1 The proposal by Shropshire Council to bring forward a Hunter's Gate extension scheme (MUW012VAR) as its Draft Local Plan preferred site is flawed from a Transport and Accessibility perspective. Section 2 contains a fuller assessment of the impact of MUW012VAR and includes, as an example only, a comparison with a more suitable site (MUW008), which is closer to the town centre, and with considerably better pedestrian and public transport accessibility: not isolated outside the southeast limit of the town, (with its own roundabout access introducing delays, noise and street lighting onto the A458

Bridgnorth Road) and detrimental impact at the critical Gaskell Corner junction both in terms of congestion and air quality. Annex 2d(iii) P.3-8

6.1.2 Guidance in the NPPF and good practice stipulates that development sites should give priority to pedestrian and cycle movements; facilitate access to high quality public transport and whose impact on the highway network and safety can be mitigated. MUW012VAR does not meet these standards whereas MUW008 (as an example) does. This imposition by the Draft Local Plan of MUW012VAR reveals both the flaws in Shropshire Council's site assessment process and the lack of consideration of alternative approaches for place planning. In any event the decision on the Preferred Site should be made through the proper planning process, which in this case is a consideration of all options through a review of the Much Wenlock Neighbourhood Plan and a proper consultation with the people of the town.

6.1.3 LPR Reg 19, Para 3.27, p21 states, "It is an [strategic] approach that seeks to nurture, protect and develop the social and physical fabric of communities, supporting new economic potential within their environmental settings." We contend that increased traffic load through unsustainable development will damage the social and physical fabric of the community, restrain economic potential in Much Wenlock and significantly harm the environmental setting of the Town. This will result in damage to the historic fabric, the loss of visual quality of its unique setting in a rural landscape adjacent to an AONB and overdevelopment which will ultimately turn Much Wenlock into a commuter town.

**6.2 In section SP14 'Strategic Corridors'**, at paragraph 3.142a, the first corridor is described as 'Eastern Belt M54/A45, A41/A464 and A4169/A458/A454. It is difficult to connect these roads into anything resembling a corridor and it appears that the Council has simply included all the A-class roads that lie within the County Boundary (i.e. avoiding Telford and Wrekin). Clarification of exactly where this 'corridor' is located and how it connects together is lacking in SP14 and this should be addressed; a plan would be useful. The Council's inclusion of the A4169 and A458 points to Much Wenlock as being part of the



'Eastern Belt Strategic Corridor'. It should be clear that this section of those two roads is unsuitable to accommodate the potential development pressures that will come with being identified as within a 'Strategic Corridor'. The junction of the two roads in Much Wenlock (Gaskell Corner) is already under significant pressure from HGVs, buses, agricultural vehicles, commuters and pedestrians; and has proven itself incapable of being upgraded (by the designers of the Ironbridge Power Station proposal). Nor is a junction improvement included in any Infrastructure Plan; therefore Much Wenlock will be impacted by an unnecessary increase in traffic at the junction, which will lead to an increase in the already severe problem of vehicles rat-running through the town.

6.3 The introduction of the strategic corridor and the increase in traffic through Much Wenlock on the A458 and the A4169 runs completely counterproductive to the need to encourage employment growth, 'soft' tourism, and sustainable development within the town, all of which have been identified in the MWNP, NPPF and which run through the LPR Reg. 19. Where are the policies within the LPR Reg19 of mitigating factors which will help to offset the damage to well-being and infrastructure and prevent Much Wenlock becoming a dormitory car-dependent town for the Black Country? On this basis alone, there is a strong argument for deleting the proposal for 1500 houses for the Black Country under the 'duty to co-operate'.

## **SECTION 2**

### **7. Place – a detailed critique of the Local Plan Review's 'preferred option'**

**7.1 Introduction:** This Section provides further information on why the LPR 'preferred option' is not appropriate for Much Wenlock and exposes the weaknesses of both the suggested site and the process by which it was identified. The case is structured under 4 headings or grounds of objection:



- **2a: Public consultation and the expectations of the Much Wenlock Neighbourhood Plan**
- **2b: Alternative approaches and options and the flawed site assessment**
- **2c: Flood events, addressing and understanding the risk**
- **2d: Current Local and Place Plan policy and infrastructure needs**

7.2 Shropshire Council has stated that the Local Plan Review has identified a 'preferred option' for Much Wenlock. As we have demonstrated, in reality, by this the Council means a 'preferred site' as no alternative development approaches have been proposed and discussed with the community and the LPR Reg19 has not put forward any assessment options. The only specific information provided by the SC for its choice of site or 'preferred option' is the presentation by Adrian Cooper on 3<sup>rd</sup> January 2019 see Annex 2b(iii) p 4 and p 12 and the SC site assessment document, which can be found here;

<https://www.shropshire.gov.uk/media/15626/appendix-n-much-wenlock-place-plan-area-site-assessments.pdf>. The LPR proposal has, unfortunately demonstrated a lack of understanding by the Council of the distinctive character of the town. S13.1 (p.237) completely ignores and disregards the special nature of the town, described as the 'jewel in the crown' of Shropshire.

7.3 Much Wenlock is a small medieval market situated between Shrewsbury and Bridgnorth.. The settlement developed around an abbey which was founded around 685. The ruins of the first abbey site can still be seen today. In 1850 the local surgeon William Penny Brookes was credited with introducing physical education into British schools which inspired the modern Olympic Games. The mascot for the 2012 London Olympic Games was named Wenlock in honour of the town's connection to the games. Today the town retains a number of black and white timber framed buildings with the Guildhall being noted as a fine Tudor building.





7.4 There are much better options than a single large site development approach to meet the requirements of SC's own policies of DP1 (Residential Mix), DP17 (Landscape and Visual Amenity) and SP1 (The Shropshire Test). 'Much Wenlock – Options for Sustainable Development' (in Annex 1) shows that there are alternative options that will deliver 'more sustainable' development and meet the policy test;

*1. Development will contribute to meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which:*

- a. Supports the health, well-being and safety of communities;*
- b. Supports cohesive communities;*
- c. Addresses the causes and mitigates the impacts of climate change;*
- d. Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;*
- e. Raises design standards and enhances the area's character and historic environment;*
- f. Makes efficient use of land; and*
- g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.*

Moreover, the community of Much Wenlock would have the opportunity to consider its preferences through a review of our Neighbourhood Plan and by definition increase community cohesion as opposed to the divisive approach adopted under the LPR.

7.4.1 Indeed a formal review of MWNP to identify better options would help underpin many of SCs own stated positions on climate change, economic sustainability and flood alleviation.

## **2a: Public consultation and the expectations of the Much Wenlock Neighbourhood Plan**

8. The MWNP Refresh Group has been attempting to engage with Shropshire Council on the LPR but it has been met with virtually nil response. Shropshire Council does not seem to want to accept that there are implications for the LPR as a result of the MWNP being made in 2014.



8.1 The Neighbourhood Plan continues to be relevant to shaping the review of the Local Plan for Shropshire to manage development to 2038. Its value lies in that it seeks to reflect the town's unique character and circumstances as well as the aspirations of the community of Much Wenlock. The Neighbourhood Plan's importance is in ensuring that the ambitions of the community are appropriately reflected in planning policy and decision making. The ambitions of the community should not be overridden by new and un-debated strategic policies which do not understand the unique character and circumstances of Much Wenlock.

8.1.1 Despite its commitments set out in the Statement of Community Involvement, since 2017 SC has not entered into any meaningful engagement with the local community throughout the LPR process. Only one short presentation was made to residents, on 3rd January 2019, and SC was to be congratulated on extending an offer to consider alternative options for Much Wenlock. However, this was not followed up and no further conversations or events have been held with the community. Alternative options and supporting evidence (based on the feedback from two community engagement events) were sent by the Refresh Group to Shropshire Council on 4 April 2019; no response has been received.

<https://sites.google.com/view/mwnprefresh/home> Annex 1a (iv) p4-10

8.2 The MWNP Refresh Group community consultation events in April 2019 were attended by over 100 residents in two sessions and, if there was one key message which came out of them, it was the absolute certainty that the Neighbourhood Plan should be recognised and abided by. <https://sites.google.com/view/mwnprefresh/community-engagement-april-2019/narrative-statement-of-the-feedback-received>

8.3 The same key message came out of the responses from the 'Have Your Say' leaflet distributed to approximately 1300 homes in Much Wenlock and the surrounding hamlets in August 2020, with a 10% reply rate. These can be found on;

<https://drive.google.com/file/d/1Oc1DmuLh-pwG0ofntaQ5zxqvc-j3Ddcy/view>

and <https://drive.google.com/file/d/1G9sGOe9VA9-8CXmgBgWabUkxPY-KcQA/view>



The Council's lack of willingness to recognise the MWNP and undertake meaningful community engagement is difficult to understand given that the joint monitoring and review of the Neighbourhood Plan in 2017 recognised its effectiveness at delivering housing numbers. 2b (iii) p10 and 2d (ii) p6. The achievement of the Connexus-funded affordable housing exception site at Callaughton Ash also showed its impact and continuing relevance to the community.

8.4 It is difficult not to draw the conclusion that SC simply did not like the answer it received from the community. It has clearly found the response does not fit its pre-disposed solution or too difficult to adapt the LPR, despite having had three clear opportunities to review including the Reg 18 and Reg 19 consultations. Accordingly it has adopted a 'one size fits all' approach to a convenient field, that has effectively ignored its responsibilities and statutory duties described in Section 1.

8.5 The presentation on the Local Plan Review (LPR) by Shropshire Council on 3rd January 2019 at the Priory Hall, Much Wenlock was attended by members of the local community, filling the hall to capacity. It quickly became evident that most attendees were largely unaware that Shropshire Council, with the support of the Much Wenlock Town Council (through its Planning and Environment Committee or PEC), had endorsed the proposal of site MUW012 for 80 new dwellings with the concurrent extension of the development boundary.

8.5.1 As the meeting progressed it became apparent that the MWTC PEC had not consulted with the community about this proposed major change to the Much Wenlock Neighbourhood Plan 2014 and that SC had relied solely upon the opinion of members within the PEC who in turn, it seemed, did not carry the opinion of the assembled community with them. There was a strong message that the community may have been misrepresented by its own elected representatives.

<https://sites.google.com/view/mwnprefresh/local-plan-review>



8.6 It was evident that the LPR had fundamentally set aside the policies and approach set out in the Much Wenlock Neighbourhood Plan, on which the community had worked so hard with Shropshire Council to agree and formalise in 2014. Yet, the assurances by Shropshire Council are on record. The minutes of the Shropshire Council meeting, 8th Jan, 2017, Item 115, helpfully, do refer to neighbourhood plans "...and in response to a Member question, gave assurance that officers would hold discussions with areas that had a formally adopted Neighbourhood Plan." Yet, no meaningful community consultation was then held.

8.7 In contrast to SC and the Town Council, the MWNP Refresh Group has continued its own efforts to engage and inform the community through its social media activity, especially through Facebook and its website. The website has information on the process and has aimed to provide simplified messages to help encourage engagement. A report of the Facebook activity up until May 2020 and a record of some of the exchanges can be found at Annex 2a (iii). Whilst there are some individual comments in support of the landowner, these exchanges generally illustrate the deep frustration felt by many in the community about the LPR process and show that, in contradiction to the Localism policies promoted by Government, trust in the planning process is being undermined.

8.8 Much Wenlock has a Neighbourhood Plan which, when 'made', was noted by Shropshire Council *"that the Plan provides an excellent platform for continued active engagement and discussion on development and related issues between the Council, the Town Council, the community and the local member."*

8.8.1 The lack of regard to the MWNP is contrary to SC's approach in other key centres in the county (such as Bishops Castle) where the LPR leaves it to the neighbourhood plan to allocate development sites. This is in spite of the fact that in 2017 Shropshire Council accepted that development is being delivered through the Neighbourhood Plan policies and is delivering the number of new dwellings as indicated by the guideline of 130 over the Neighbourhood Plan period.



8.9 Turning to the Local Plan Review, Shropshire Council consulted on the Preferred Scale and Distribution of Development at the end of 2017. The proposed housing guideline was 150 over the plan period, and given that Much Wenlock's Neighbourhood Plan 2013-2026 growth guideline was 130 dwellings, this addition felt like a sensible number. It reflected the housing growth being experienced in the town and its likely trajectory over the extended plan period.

8.9.1 The response to the Refresh Group's 2019 consultation on the scale and distribution of development for Much Wenlock, indicated general support for a guideline of 150 dwellings over the plan period. However, Shropshire Council's proposal for its 'preferred' single site for 80 dwellings in Much Wenlock did not meet with local support. The current proposal for 120 dwellings on a single site - revealed as late as Spring 2020 without notification and has been subject to minimal local consultation - met with even less support than its predecessor.

8.8.2 This 120 dwelling proposal combined together with the known current levels of incremental growth will, over the plan period, far exceed SC's target of 200 dwellings (Schedule S13.1(i) Residential Allocations: Much Wenlock Key Centre p237) for the town. There will be massive pressure on Much Wenlock's fragile environment and infrastructure from this and other development in the Much Wenlock Place Plan area. This will arise from building 1,000 homes in nearby Buildwas/Ironbridge Power Station, 80 dwellings in Cressage just down the road, and development north of Bridgnorth that will pile further pressure on the A458 and A4169, now designated as a Strategic Corridor as these roads weave through the town's conservation area.

8.10 In the absence of any previous communications from SC through the LPR process, many residents of Much Wenlock were aware of the **Shropshire Council Cabinet meeting which was held on 20th July 2020** to discuss the LPR and sent questions to the meeting looking for a response from Cllr Robert Macey (Chair). There were 15 questions submitted



by the public from Much Wenlock and the list of questions can be found at Annex 1a(iv) p 15-20 . The recurring theme was;

*Will Cabinet now agree to drop the ‘preferred option’ site being imposed on Much Wenlock, and instead allow the community to decide the best planning option for 150 houses through a review of their Neighbourhood Plan?*

8.10.1 The response from that meeting was perceived by many in the community as inadequate;

Rob Macey grouped the questions into broad categories and non-answered the first in each category with a “See \*the appropriate Section in the LP Draft” rather than actually engaging with the question. The categorisation was very broad so that all the questions about flooding and water issues (for example) were grouped together. Subsequent questions were answered with a “See my prior answer on flooding”.

8.10.2 Most of the (non-)answers Cllr Macey gave were of the “we’ll get into that during the consultation period”, or “that documentation will be available during the consultation period”. It was thought by some residents to be particularly disingenuous for Cllr Macey to pretend there had been vigorous public consultation with the Town Council and the public.

### **8.11 Refusal to work through local community structures**

The alternative for SC would have been to agree a community engagement approach through the neighbourhood planning designated body or other community groups. Indeed, SC makes strong mention of community involvement through Town Councils throughout its SCI. We understand that members of the Much Wenlock Town Council (MWTC) met with SC officers on just one occasion, on 7th November 2017, A note of an unrecorded meeting 7 Nov 2017, can be found in Much Wenlock Planning Committee Minutes 31st Oct 2017, Annex 2a(i) in the evidence file found on the MWNP Refresh Group web site.

(note: there is no further recording of the results of this meeting in the public domain)

8.12 This followed an invitation by the MWTC to the landowner of the 'preferred option' site to explain its proposals (MWTC Planning Committee meeting of 5th September 2017). The MWTC did not meet with any other landowner, without any recourse to engagement with alternative options and the community. Annex 2a (i) p1-6.

*Item 6 c) Shropshire Council 'Call for Sites' and Local Plan Review*

*'The Chairman invited Stuart Thomas from Berrys, on behalf of Wenlock Estates, to brief the Town Council about their response to Shropshire 'Call for Sites' & Local Plan Review. Mr Thomas explained that the review was a formal request to anyone interested in putting forward potential sites for consideration within the Strategic Land Availability Assessment (SLAA) and this consultation ended in March 2017. Berrys had therefore put forward land adjoining Much Wenlock Primary School to the rear of Hunters Gate for promotion as a suitable development site for housing development in the emerging Local Plan. Berrys recognised that the site was not included in the Neighbourhood Development Plan for Much Wenlock nor Shropshire Council's SAMDev and they had therefore put forward the site as a new site in response to the public consultation exercise.'*

Without any further consultation, the MWTC endorsed the LPR 'preferred option' on 8th Jan 2019

8.13 However, SC did not agree any approach with the Much Wenlock Town Council for wider consultation and so there has been no meaningful engagement process. The minutes of the Town Council's meeting of 5<sup>th</sup> March 2020 demonstrate that the MWTC has deliberately refused to seek the views of the community, in contradiction to the expectations of the SCI. Equally there is clear evidence that Much Wenlock Town Council has not on its own initiative undertaken any meaningful consultation with the residents of the town, indeed the Town Council believed that it was not a statutory consultee on planning matters; the minutes of the MWTC Planning Committee on 8<sup>th</sup> Jan 2019 demonstrate that it had adopted



an attitude that it neither wished to engage with the community or with Shropshire Council on the subject of the preferred site MUW012; it was content to come to its own conclusions in accepting the same which it would forward to Shropshire Council at the appropriate time with no further discussion. Annex 2a (i)

8.14 The Town Council report to the Wenlock Herald dated May 2019 highlights a less than willing attitude of the MWTC to engage with and to consider the outcomes from public engagement events undertaken by the Refresh Group

[https://sites.google.com/view/mwnprefresh/news#h.p\\_IWxyqvs58Y2](https://sites.google.com/view/mwnprefresh/news#h.p_IWxyqvs58Y2) .

The minutes of the Much Wenlock Town Council dated 4 April 2019 record that the Town Council actively proposed and voted against any communication with the community Refresh Group.

<http://www.muchwenlock-tc.gov.uk/wp-content/uploads/2019/05/Minutes-4-April-2019.pdf>

8.15 This closing down of discussion with its own community is magnified by a notable absence of any publicly available written reports or formal evaluations of development options for the town, either by the Town Council or Shropshire Council. When asked for documentary proof that the MWTC Planning Committee had received papers to consider all options in the decision making process it was confirmed that there were none; see Annex 2a (i) Email exchange with the Town Clerk.

8.15.1 Of course, SC could have encouraged the MWTC to undertake consultation or supported the initiative of the MWNP Refresh Group to engage with residents and developed a meaningful engagement process. It has not done so. However, despite the lack of engagement with the community, SC has been active in progressing negotiations with the landowner for the 'preferred option' site, MUW012VAR. It can be readily concluded from the general appreciation of challenges facing the town set out in the LPR consultation and Place Plan documents, alongside the lack of any appraisal of options to resolve these challenges, that SC was committed from an early stage in the LPR process to a single negotiation with a



single landowner. The outcomes or proposals from these numerous meetings have not been discussed with local residents.

8.16 In February 2020, the owner of MUW012 revealed that the SC 'preferred option' was unviable and put forward a larger scheme for 120 houses. At short notice the landowner held a single 2-hour drop-in event on 26th February to display its proposals. This was an unstructured 'show and tell' format with limited information and its outcomes were unrecorded. SC neither endorsed nor engaged with this event. MWTC was confused as to whether it could be called a consultation or not.

*Councillor Harper commented that Berrys, the agent, had held a consultation event at the Priory Hall when the proposed housing number for MUW012 had been increased, and that Shropshire Council would regard this as consultation. Councillor White disagreed, stating that, in his opinion, this had been an information session and no proper consultation had taken place. (MWTC Meeting August 20, 2020 Item 7)*

8.16.1 SC did not advertise this event across the community as being a part of the LPR and did not subsequently arrange for any further local discussions as to the implications for the LPR and the town. The Refresh Group did capture a limited, but we consider representative, set of comments through listening to conversations with Berrys representatives. We understand this is the only record of the event and the comments expressed were predominantly negative. Annex 2a (ii).

8.17 It has emerged that between the Reg 18 (MWPP Site Assessment 2018) and Reg19 versions of the LPR that MUW012 now appears not to exist in its original form with an allocation of 114 houses, (though it continues to feature on the S13 map). The site has now inexplicably doubled in size and undergone a completely new site assessment by Shropshire Council, dated 2020. The latest preferred site is MUW012VAR has a sustainability rating of only -4 Fair and has an allocation of 228 dwellings (Appendix N Much Wenlock Place Plan Area Site Assessments Published: August 2020). This increase in size is worrying and



confusing, as it infers in-principle approval to an even larger development and is being proposed on a site not really fit for development and originally proposed to the community as a site suitable for 80 dwellings. Yet again, SC through a site-based approach undermines its purported commitment to place-making.

## **2b Alternative approaches and options - certainty & deliverability and SC's flawed site assessment.**

9.1 The Council's overriding desire to allocate a large site as the only option for meeting a 5 year land supply is not sufficient in planning terms; both quantitative and qualitative outcomes are necessary to achieve a sustainable place.

9.2 We know from making the MWNP and the April 2019 community consultations, carried out by MW Refresh Group, that residents of Much Wenlock recognise the need, both nationally and locally, for more housing and particularly affordable homes for locally connected people. There is also a perceived need for smaller dwellings and dwellings within secure surroundings for the older downsizing residents. This local outcome for development is a reflection of a national trend; Economic and Social Research Council funded research recently reported that age segregation in housing has increased in recent decades, with less likelihood of older and younger adults sharing the same residential area. New research shows that age segregation is higher in areas where housing is least affordable, potentially challenging social cohesion.

[https://esrc.ukri.org/news-events-and-publications/evidence-briefings/house-prices-push-old-and-young-into-separate-neighbourhoods/?utm\\_medium=email&utm\\_source=govdelivery](https://esrc.ukri.org/news-events-and-publications/evidence-briefings/house-prices-push-old-and-young-into-separate-neighbourhoods/?utm_medium=email&utm_source=govdelivery)

LPR Reg 19 SP6 Health and Wellbeing (pp 29-30) talks about many of the needs for community well being, yet it is not evident from the LPR that a single large commercial housing development will meet these local needs.

9.3 The NPPF and local policies expect a range of objectives to be delivered when considering the location and scale of development. SC's current Core Strategy Vision and



Policies and the Place Plan recognise the importance of retaining the distinctiveness of Much Wenlock. Sadly, and despite these policy ambitions which are additionally set out in the LPR Reg 19, SP6, the way that SC has approached the LPR demonstrates a lack of practical understanding about the quality of the historic market town and the options available to it.

9.4 Shropshire Council first identified a requirement for 150 houses and then extended this (without explanation and consultation) to 200 houses. The basis for its top down solution of a specific large site of (originally) some 80 and then 120 houses was (as presented to the community) to provide certainty of delivery of the numbers of dwellings. Shropshire Council has made much of the need for 'Certainty and Deliverability', such that it has closed down discussion on alternatives (see email dated 15<sup>th</sup> April 2019; Annex 1a (iv)). The Council's site assessment process did identify a number of potential housing sites that, allowing for continuing infill development, could accommodate through smaller scale development in potentially better locations, the additional 20 houses originally suggested by the LPR to 2036. Yet alternative approaches have not been considered to any meaningful extent by Shropshire Council. Unexplained change and accompanying confusion for the community have seemed to be the hallmark of the policies and decisions of both SC and MWTC.

## **10 Certainty and Deliverability Annex 2b (iii)**

To further demonstrate the alternative options open to Shropshire Council, the MWNP Refresh Group produced a Certainty and Deliverability report (see the link below) which is supported by an analysis of SC's latest (2020) assessment of potential sites in the Much Wenlock Place Plan Area. This latter document exposes a number of factual and technical flaws in the SC's evidence base.

[https://drive.google.com/file/d/1gTI8r9BR-E8y\\_lyxYLjMavyHuDx9N9Y3/view](https://drive.google.com/file/d/1gTI8r9BR-E8y_lyxYLjMavyHuDx9N9Y3/view)

<https://docs.google.com/document/d/1AyDxWQqkZ-EwK-wE3-s-7yTHeUyumDu9z6YD5HMAHbg/edit>



10.1 As a starting point, we can state that current MWNP approaches to securing housing development are succeeding. Annex 2b (iii) illustrates how housing both in the market sector and affordable housing on exception sites is currently being delivered and set to maintain the agreed target levels set by SC by 2036 or 2038.

10.1.2 Shropshire Council's imposition of a single large site ignores the policy direction within the adopted Core Strategy and Much Wenlock Neighbourhood Plan, therefore ignoring the stated expectations of the community. It does not need to do this, the report found that:

- Deliverability through a more complete assessment of the potential site options <https://sites.google.com/view/mwnprefresh/local-plan-review> has already highlighted that the Shropshire Council assessment of potential sites is flawed. The Much Wenlock Place Plan Site Assessments (Shropshire Council, Nov 2020) lists five separate sites, all of which are suitable for supplying development to meet the town's needs.
- Certainty through small scale development represents an average of between 5 and 6 dwellings per year required to fulfil the SC Housing preferred number of dwellings guidelines for Much Wenlock. Shropshire Council's own figures (see link below) show that over a two to three-year time span (spanning 2016-18), 55 new dwellings have either been completed or committed, a current delivery rate of 18 per year. This delivery is far in excess of both the recent and current stated targets for new dwellings in Much Wenlock. <https://drive.google.com/file/d/1BdDRtPs-6jqxRAdwfqC8emGyNF8lVPOb/view>
- Affordable homes for local people can and will continue to be delivered on exception sites.

10.2 We therefore continue to advocate that the LPR should not impose any particular site or outcome for Much Wenlock and – in the legal and moral framework of Shropshire Council's



Statement of Community Involvement (2011) and national guidance - the choice of how to deliver the extended housing target should be left to a proper community engagement process through a review of the MWNP.

### **10.3 Affordable Homes**

Much Wenlock Town Council at its Extraordinary Meeting of the 20<sup>th</sup> August 2020 insisted with seeming certainty that Much Wenlock was entitled to 20% affordable housing within any new development. This is not entirely true, although the MWNP advocates 20% the Shropshire Type and Affordability of Housing SPD 2012 Chapter 4 section 27 page 19 and Appendix C . It would appear that exceptional unexpected costs, for example flood alleviation schemes, can legitimately reduce the number of houses provided using the 'open book accounting approach'. Annex 1b (v) p 8

<https://www.shropshire.gov.uk/media/8593/adopted-type-and-affordability-of-housing-spd-2012.pdf>

10.4 Shropshire Council Homepoint delivery service for rented social housing admit that no recent housing survey has been carried out in Much Wenlock. Which makes it difficult to see how the right type of affordable housing to meet local needs can be delivered through market development options. Annex 1b (v) p 8

## **11. Site Comparisons**

[https://drive.google.com/file/d/1gTI8r9BR-E8y\\_lyxYLjMavyHuDx9N9Y3/view](https://drive.google.com/file/d/1gTI8r9BR-E8y_lyxYLjMavyHuDx9N9Y3/view)

11.1 The current Core Strategy (CS) endorses the importance of alternative options as part of a strategic approach expected under the NPPF. Given that the site assessment process is the only substantial evidence set out by SC for its approach, the MWNP Refresh Group thought it important to review the quality of the assessment. This would help establish

whether there were better alternatives to meet the target and therefore the need for certainty.

11.2 The SC 2020 site assessment does not wholly conform to the LPR Reg 19. 2.28, p21 *'Where there is a known infrastructure constraint from otherwise sustainable development proposals, the individual settlement policies identify these needs.'* As is plainly the case with the Gaskell corner pinch point, this desperate pinch point seems to have been given rather short shrift in all of the recent assessments.

*We stress that the Refresh Group does not advocate any particular site and that it must be for the wider community to decide on the site which it prefers to meet the needs of the town.*

11.2.1 Our research shows that other approaches and sites are available which are better suited to the needs of the community and delivering more sustainable outcomes. Sites rejected by SC's assessment are stronger candidates.

**11.3 Re-use of existing land.** Policy CS15 (Towns and Rural Centres) specifically supports the appropriate reuse or regeneration of land and premises but these sites not been considered by the LPR Reg 19 (SP1.1.f. making efficient use of land) for Much Wenlock.

11.3.1 Two examples would be MUW001 Smithfield works and MUW002, Builders Yard, Smithfield Rd.; these sites have potential for small sites for older residents and new doctor's surgery facilities. Both are brownfield sites within the town capable of redevelopment. They would be suitable for housing (e.g. retirement living in maisonette design style) which meets known local needs, they are not located in the most flood-prone areas (unlike the greenfield MUW012VAR) but can contribute to reducing flood risk and lend themselves to development that addresses sustainability and mitigates against climate change. Looking ahead to the suggested Planning White Paper reforms, these sites can be considered renewal of existing land 'gentle densification'.



The MWNP work previously identified some options to make available small sites in the town. The Council can apply its CPO powers, recently enhanced by Government, should landownership and ransom strips be a constraint to bringing land forward.

**11.4 Alternative greenfield sites.** Furthermore MUW006 (Part: off Bourton Rd to Dark Lane) has potential to deliver market dwellings in line with the MWNP policies, if certain 'ransom sites' are made available. Perhaps the most immediately available site is MUW008, land to South of Sytche Lane, and this presents a particular opportunity. The stage 3 detailed assessments begin on p19, MUW008 on pages 26-28 and MUW012VAR on pages 35 -37 of the Much Wenlock Place Plan Area site Assessments, Nov 2018 (updated 2020)

[https://drive.google.com/file/d/0B7zrkNUu4\\_1cndtdnVuc1hjanNvNkpsWDVxSVdjVEN0WUg/w/view](https://drive.google.com/file/d/0B7zrkNUu4_1cndtdnVuc1hjanNvNkpsWDVxSVdjVEN0WUg/w/view)

There are also other options to extend the development boundary which would better suit a cohesive and integrated community; however the lack of proper consultation with the community has placed these options out of reach.

**11.5 Inappropriate choice of MUW012VAR.** That Shropshire Council has been able to recommend MUW012VAR as its 'preferred option' site is very surprising. It fails to meet both the MWNP policies and, more surprisingly, does not meet Shropshire Council's own 'Open Space, Sport & Recreation Interim Planning Guidance' policies (adopted 22nd Sept 2010). As described in Section 1, the site is also located in the most flood-prone area of the town.

11.5.1 Additionally, the policy case for certainty in deliverability is strengthened as all of the alternative sites accord with other current and proposed policy guidelines. Each has the potential to be small enough to be in line with the MWNP policies. They are within the 10 minute walking distance criterion to the town centre or recreation facilities, as required by Shropshire Council's Open Space policies and accord with LPR Reg19 SP3 and SP2, helping to reduce motor journeys and underpinning national and local commitments towards net zero to tackle the Climate Change that affects us all;



## 12. 1 Climate Change (SP3)

1. *Reducing carbon emissions through a number of means, including:*

a. *Minimising the need to travel and maximising the ability to make trips by sustainable modes of transport, including through the urban approach to development identified within Policy SP2;*

b. *Supporting the principle of delivering higher density development on the most accessible urban sites;*

c. *Supporting the transition to a circular economy by reducing waste and maximising the re-use and recycling of material resources;*

d. *Prioritising use of active travel through the creation and enhancement of walking and cycling links within and between new developments and from new developments to existing neighbourhoods and community facilities in accordance with Policy DP28;*

For further details of our analysis please see Annex 2d (i) p4

[https://drive.google.com/file/d/0B7rzrkNUu4\\_1cndtdnVuc1hjanNvNkpsWDVxSVdjVEN0WUg/w/view](https://drive.google.com/file/d/0B7rzrkNUu4_1cndtdnVuc1hjanNvNkpsWDVxSVdjVEN0WUg/w/view), which provides an informed insight. Our work has started with the information on the site comparisons taken from Shropshire Council site assessments (November 2018 revised 2020; Much Wenlock Place Plan Area – Site Assessments).

<https://shropshire.gov.uk/committee-services/Data/Cabinet/20120111/Agenda/16A%20Open%20Space%20Interim%20Planning%20Guidance%20Appendix%20A.pdf> Page 9 and Annex 2d (i) p4

## 13.1 Alternative development approaches in Shropshire

It is not as if Shropshire Council is not aware that it can take a better and more inclusive approach to development and growth than the one it has taken so far in Much Wenlock. See Annex 2b (i). There are two local examples at:





The Sansaw Estate, Hadnall, Shropshire

<http://sansaw.co.uk/sansaw-estate-to-work-with-the-community-to-make-hadnall-the-best-place-to-live-in-shropshire/>

and in Oswestry where SC has established The Future Oswestry Group

<https://www.shropshire.gov.uk/oswestry-gateway-project/future-oswestry-group/>

S13.1 imilarly, there is a marked contrast in the level of engagement with other places which exposes the lack of initiative by both Shropshire and the Town Councils. For example, the support provided by Shifnal Town Council (see here):

[https://www.shifnaltowncouncil.gov.uk/stc/uploaded\\_photos/Shifnal-LocalPlanLeaflet20181129.pdf](https://www.shifnaltowncouncil.gov.uk/stc/uploaded_photos/Shifnal-LocalPlanLeaflet20181129.pdf). Shifnal has a 'made' neighbourhood plan.

## **2c: Flooding events - addressing and understanding the risk**

### **14.1 (i) The broad picture – Much Wenlock as a whole**

Following significant flooding which affected the town in 2007 a Much Wenlock Flood Action Group was instituted. It considered all sites subject to flooding, including the site now designated MUW012VAR and the adjacent Hunters Gate development. In its final report in 2010 the group identified previous incidents of flooding which took place in 1931, 1992, 1993 and 2000. Others are less well documented. In reality, flooding has affected generations of residents. Extensive house building since WW2 has simply increased both local runoff and flood risk.

<http://www.muchwenlock-tc.gov.uk/wp-content/uploads/2019/03/Final-Flood-Plan.pdf>

14.2 In response to the 2007 flooding the electors of Much Wenlock demanded a referendum which voted strongly against further development until flooding issues were



resolved. The Town Council then endorsed that resolution in January 2008. This has not been rescinded.

14.3 In March 2011 a report was produced for Shropshire Council by Mouchel, providing a Preliminary Flood Risk Assessment for Much Wenlock. This noted the different geological influences to the east of the town from those in the west where permanent water courses exist. It commented upon the significance of groundwater flows affecting the eastern side, including site MUW012VAR. It also outlined and costed options for action, including proposals for flood alleviation affecting site MUW012VAR. Shropshire Council has failed to proceed to a further, more detailed assessment or to implement this element of the proposals.

<https://www.shropshire.gov.uk/media/5972/much-wenlock-iudmp.pdf>

14.4 In 2014 a Planning Inspector considered the Shropshire Site Allocations and Management of Development Plan. The Inspector's Report made no comments on proposals for Much Wenlock, based on the assumption that its Neighbourhood Plan policies would guide its development. Among the countywide requirements of the Inspector was that Shropshire Council should "identify all sites where a site specific Flood Risk Assessment will be required...". Neither the contradiction with policies of the Neighbourhood Plan nor the requirements of the Planning Inspector seem to have deterred Shropshire Council from identifying MUW012VAR as a 'preferred site'.

<https://shropshire.gov.uk/media/8232/samdev-plan-inspectors-report.pdf>

14.4.1 Satellite monitoring and computer modelling had enabled the Environment Agency to identify the Much Wenlock bowl as a 'Rapid Response Catchment' at serious risk of flooding. This designation of 2015 implies not only a risk to property but also to life. This flood risk is also noted as liable to increase as a result of climate change.

[http://www.bhssw.hydrology.org.uk/bhssw\\_files/m.dale\\_20101020.pdf](http://www.bhssw.hydrology.org.uk/bhssw_files/m.dale_20101020.pdf)

14.5 The Environment Agency and Shropshire Council subsequently approved the construction of two flood attenuation ponds along water courses on the western side of Much Wenlock. Completed in 2017, they were designed to protect 171 properties as well as an electricity sub-station. They proved effective in mitigating the effects of the flooding to the west of the town when flooding occurred in February 2020, though still up to 20 properties were affected to varying degrees. No similar action has been taken on the east side of Much Wenlock, where there was no water course across which to easily construct an attenuation feature.

**15. (ii) Managing flood risk on site MUW012VAR and the Hunters Gate development.**

15.1 Site MUW012VAR and the adjacent Hunters Gate housing development stand on land that for many generations was part of the Much Wenlock Racecourse. The land lies beneath the Walton Hill and slopes from both the south and the west towards the point where Hunters Gate and Forester Avenue meet at the end of Barrow Street. The water jump of the racecourse stood close to this location. Its water trough was fed by groundwater rather than by a permanent water course. In heavy rainfall, water accumulating adjacent to the water jump then flooded across the road. A photograph, taken in the late 1940s, shows serious flooding across the road. It was over a foot in depth adjacent to the Gas Works Manager's house, which still exists. Since then, occasional minor flooding in this area did not affect homes prior to 2000, as there remained an open route across the road for flood water into parkland.

15.1.2 When planning permission was sought for the Hunters Gate development objections were raised on the basis that the development would increase flood risk downstream. The developers persuaded the planners that the construction of sustainable urban drainage systems (SUDS) across the site would reduce rather than increase flood risk. Planning permission was granted on that basis and work commenced after 2000.

15.2 Residents moving into Hunters Gate began to experience relatively minor instances of flooding prior to 2007 and complained to the developer, to Bridgnorth District Council, to Severn Trent and to the NHBC. It eventually became clear that the SUDS had not been constructed in compliance with the plans and that no “as built” plans had been lodged with Bridgnorth District Council. It also transpired that this planning authority had no buildings inspector at the time the development was progressing, that the NHBC did not inspect sites and that Severn Trent had apparently adopted the site on the assumption that there had been compliance with the approved plans. Appeals to the planning authority to hold the developer to account fell on deaf ears.

15.3 In 2007 a major flooding event across Much Wenlock took place on 25th June. Numerous residents across Hunters Gate were affected with inspection caps being forced up by the water pressure across the development. Some residents of Hunters Gate, close to the junction with Barrow Street, had water rising through the floor and flowing out of their front doors. The failure of the SUDS system to prevent this problem and the surface flow from hard surfaces raised serious concerns. A variety of research has subsequently established that, while desirable, SUDS in themselves are not sufficient and can become ineffective in prolonged heavy rainfall or flash flooding, especially if not maintained. Objections to the original development, on the basis of increased flood risk, proved justified and flooding downstream was extensive.

<https://www.gov.uk/government/publications/a-review-of-the-application-and-effectiveness-of-planning-policy-for-sustainable-drainage-systems>

15.4 Residents of Hunters Gate were later active in the local Flood Action Group supported by Much Wenlock Town Council; others joined the official Middle Severn Flood Forum led by the Environment Agency. Their intention was to address the flooding risks across Much Wenlock as a whole and they gave their support to the initiative to construct attenuation ponds along the water courses to the west of the town. They did so on the understanding



that the problems in the Hunters Gate area would also be addressed. There have been protests at the lack of any visible action to resolve these particular flooding issues. These protests became stronger when it became apparent that resolving the flood problems was to be contingent upon the approval of a further housing development on site MUW012VAR.

15.5 Shropshire Council has only begun to consult seriously with residents on flooding risk at Hunters Gate in January 2021. This single discussion has revealed SC has held multiple discussions with the commercial developer/landowner and revealed SC's predetermined approach to their 'preferred option' for development. However, it also shows that alternative (non-housing led) solutions exist and are viable. See Annex 2d(iii) pages 3-5 ; Note of meeting with John Bellis, SC Flood Manager).

15.6 In the meantime, Severn Trent had agreed to investigate and map the surface water and sewage systems installed on Hunters Gate by the developer. This task was sub-contracted to Richard Allitt Associates who enjoyed the cooperation of residents in conducting the survey, having been promised transparency. That report has never been made available in full to residents. The initial failure of the developers to comply with the planning permission, subsequent failure by the developer to accept responsibility for remedying flood problems and the failure of Severn Trent to publish the report from Richard Allitt Associates have combined to ensure that there is no confidence among residents in promises of effective developer-led flood alleviation.

15.7 In January 2019 a public meeting was held in Much Wenlock to discuss the unexpected proposals from Shropshire Council for a "preferred" housing development site in Much Wenlock. Most of those present, of whom only a minority were from Hunters Gate, expressed strong opposition to the proposal to build 80 houses on site MUW012. Several of the most vocal objectors were residents of Farley, downstream from Much Wenlock. There

the water course falls very steeply toward the Severn and the impact of flooding in Much Wenlock is greatly magnified.

15.8 In early 2020, the agent for the landowner produced a revised, even more unwelcome, proposal. This proposal for MUW012 was revised upwards to seek consent for 120 rather than 80 houses on the site, their proposal was adopted by SC in its revised site assessments of 2020. The aim, among other things, was to cover the newly recalculated costs of flood attenuation. This followed a new hydrological investigation, on behalf of Berrys and the developer, more detailed than that carried out by Mouchel on behalf of Shropshire Council. Their published brief noted that –

*“During flood events significant volumes of water are shown to run across the site and down into the Hunters Gate development below. This accords with the known problems of flash flooding on Hunters Gate and the fact that the combined sewer in Barrow Street cannot cope at times of flash flooding.”*

<https://www.berrys.uk.com/preferred-site-allocation-muw012-consultation-documents>

15.9 Anger surfaced dramatically when, as long feared, new more extensive floods took place on the 16th February 2020. There had been several times, between 2007 and 2020, when homes in Hunters Gate narrowly escaped flooding. In February 2020 the flooding was even more extensive than in 2007 and affected more homes.

Annex 2d (iii) p2

15.9.1 Neither in 2007 nor in 2020 was Much Wenlock subject to “flash flooding” as the revised proposal from Berrys implies. This calls into question the quality of the hydrological survey on behalf of Berrys, the agents for the developer. On each occasion flooding in and adjacent to Hunters Gate has, in reality, resulted from continuous rain over a protracted period. This has led to groundwater flow and spring sapping, visible on site MUW012, and to surface water flow from hard surfaces in Hunters Gate. If “flash flooding” were to occur the damage and risk to life in Much Wenlock would potentially be much more dramatic.



15.10 Following receipt of the revised proposals and the occurrence of the February 2020 flooding the anger of residents not only in Hunters Gate but also downstream rapidly increased. One result was a petition to the Much Wenlock Town Council which has consistently failed to demand flood protection in this part of the town independent of further development. The Town Council had also endorsed flood risk reduction contingent on approval of Berrys proposal for 80 houses on MUW012 which had been chosen by Shropshire Council as its preferred site. In lending its support to this proposal the Town Council had ignored the policies of the Much Wenlock Neighbourhood Plan and also failed to undertake any alternative public consultation.

15.11 The petition from residents demanded that the Town Council take action to provide residents on the eastern side of the town with the same level of protection from flooding provided by the attenuation ponds to the west of the town. It protested at the stance of the Town Council making flood prevention contingent on further housing development, a solution considered likely to make the flooding worse and not imposed on residents elsewhere in the town. The petition also pointed out that the residents of Hunters Gate pay the same Council Taxes and Water Charges as other residents and now demand a similar level of flood protection which, in common with other residents, should be free from any link to further housing development.

15.12 Analysis of the details of actions taken in recent years to respond to flooding in and around Much Wenlock indicate that limited investigations, some lacking transparency, have been accompanied only by a piecemeal approach to remedies. Some parts of the town seem now to be relatively well protected while others have been badly neglected. Those living downstream from the town remain in a particularly vulnerable position. It seems clear that the Local Plan Review has not, or has not shown, it has followed the sequential test in respect of flood risk. Its site assessment process is flawed and we have shown that other viable and smaller sites are at less risk. The Draft Plan policy appears to be suggesting that MUW012VAR will be expected to deliver solutions to a historic and real failure (at named

locations) but this cannot lawfully be imposed. There is a risk that a prime justification for the site will be undermined by a later detailed negotiation which sees the developer challenge the validity of the policy and condition. How did it come about? Is the change in the site area and the artificial inflation of the housing numbers (from 150/80 to 200/120) driven by unjustified claims from the developer and/or is it SC skewing the process to secure gain? It is clear that only a comprehensive catchment wide assessment, backed up by an agreed and appropriately funded remediation plan will restore public confidence that future development will result in a secure, flood and fear-free future for the entire community.

## **2d: Local and Place Plan policy and housing and infrastructure needs**

16.1 The current Core Strategy/Local Plan, the SAMDev report and the Much Wenlock Place Plan make acknowledgment of the importance of the Much Wenlock Neighbourhood Plan. The infrastructure needs of the town are set out in the Much Wenlock Place Plan which clearly alludes to emerging problems with traffic and road safety, public transport, sewage capacity, flooding and NHS provision. It is also noted that there is a need for more accessible green space.

*'Development should be phased appropriately to take account of critical infrastructure delivery and seek to positively contribute towards local infrastructure improvements, including the provision of community benefits.'* (P 16-20 MWPP)

16.2 There is no clear solution to the very real concern expressed by many residents of both Cressage and Much Wenlock regarding the lack of capacity for the provision of health care by the only doctor's practice for both settlements. Nor is there any reference to the traffic issues and highways management, especially the continuing congestion at the Gaskell Arms Junction and water shortages.





16.3 The poor quality of public transport means current and future residents will rely on the private car for the foreseeable future, which does not accord with the Climate Change policies mentioned above. Indeed, in 2019 Shropshire Council put forward a proposal to effectively halve the frequency of bus services to Shrewsbury. There is no practical bus service to Telford. The county's declaration of a climate change emergency, LPR Reg SP3. 1a-d requires that future planning policy takes greater account of infrastructure issues.

There is a continuing and widespread issue with uneven water pressure over the whole town of Much Wenlock. Annex 2d (iii) p 2

16.3.1 The lack of connection to the MWNP and these other important policy contexts, requires us to ask what exactly is SC relying upon to justify its proposals and whether there have been changes in context which are important for shaping the best planning option.

**17.1 The Much Wenlock Place Plan:** Throughout the LPR, Shropshire Council has placed great stress on the building block of the Place Plan for Much Wenlock (MWPP). The boundary of the Place Plan covers the supposed 'hinterland' of the town and includes neighbouring parishes to the north. The Place Plan can be found here; <https://shropshire.gov.uk/media/13891/much-wenlock-2019-20.pdf> and it relies on a number of documents (page 18 of the MWPP)

- Core Strategy – adopted 24 February 2011
- Site Allocations and Management of Development (SAMDev) Plan – adopted 17 December 2015
- Much Wenlock Neighbourhood Plan - adopted 17th July 2014  
<https://www.shropshire.gov.uk/media/8560/much-wenlock-neighbourhood-plan-adopted-version.pdf>

All of these documents stress the importance of the distinctive quality of the market town and the ambition of 'balanced growth' to deliver limited development to meet local needs. The MWPP goes further in listing a number of infrastructure needs required by the town but



doesn't propose a plan for addressing them. There is no indication of delivery mechanisms or funding streams and nor is there any sense provided as to exactly what the LPR should deliver for the town.

17.2 The LPR omits to address these infrastructure needs except for suggesting that a major housing development can solve the town's flooding problems and provide a roundabout. Nowhere is there a considered report and evaluation of the need or quality of the housing, the priorities for infrastructure, a strategic consideration of flood risk nor is there a consideration of the platform which the MWNP provides for the LPR. All of these would be expected in a considered and rational planning process.

SC's Infrastructure Funding Statement (December 2020;

<https://shropshire.gov.uk/media/16849/annual-infrastructure-funding-statement-2019-20.pdf>

for recent investment and for future projects.

## **18 Transport and Accessibility**

### **18.1 Introduction**

In the Shropshire Local Plan Review (SLPR), Shropshire Council has identified a single Much Wenlock site, located a considerable distance from the centre of the town, as their preferred development site for housing. The site lies to the southeast of the town and is an extension to the existing Hunter's Gate residential development. The site is identified in the SLPR as MW012VAR.

18.2 This assessment considers the overall transport impact of the SLPR preferred residential site in Much Wenlock, (MW012VAR) and in order to place this assessment in a comparative context, reference is made to an alternative site (Sytche Lane; identified as MW008 in the SLPR). This comparison is made to reinforce the unsuitability of MW012VAR, not only as a stand-alone development site, but also, and in particular, when compared to more appropriate sites in Much Wenlock. Reference to MW008 should therefore not be interpreted as a recommendation that this site should be identified as the Preferred Site; any



such recommendation can only come about following a review of the statutory adopted neighbourhood development plan (*the Much Wenlock Neighbourhood Plan*), following a full consultation with the people of Much Wenlock.

18.3 Traffic impact in this assessment is focussed on the junction known as the Gaskell Corner, located to the west of Much Wenlock town centre. This junction gives priority to the A458 primary route (Victoria Road and Bridgnorth Road), but also serves the B4378 Bourton Road; the A4169 Smithfield Road; and the High Street. The layout of this junction is shown at Appendix.2d(iii) P.3.

18.4 The basis of this assessment is the guidance given in the 2019 National Planning Policy Framework (NPPF); specifically paragraphs 108-110 which state, inter alia:-

*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

*a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users; and*

*c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

*109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

*110. Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport,*



*with layouts that maximise the catchment area for bus or other public transport services,  
and appropriate facilities that encourage public transport use;*

18.4.1 This assessment demonstrates that, with the exception of paragraph 108 b), the preferred site MW012VAR does not satisfy any of the transport requirements identified in the NPPF; and that within Much Wenlock, the site MW008 (for example) is clearly preferable.

## **18.5 Assessment**

### **1. Traffic Impact**

*[Following a review of publicly available documents, it has been concluded that the most recent operational assessment of the Gaskell Corner junction has been carried out as part of the supporting documentation for the major mixed-use development proposal at the former Ironbridge Power Station site. (Shropshire Council Ref: 19/05560/OUT (PP-08327987). Consequently, some of the technical data used in this assessment has been taken from that Application's Transport Assessment Addendum (Published 17<sup>th</sup> August 2020) prepared by ADC Infrastructure Ltd. The Transport Assessment Addendum document and its accompanying Appendices are accessed through the Shropshire Council Planning Portal ([www.shropshire.gov.uk](http://www.shropshire.gov.uk)). The review of a specific Gaskell Corner-related section of the TAA is included here to demonstrate the limitations of the junction].*

18.6 The Transport Assessment Addendum (TAA) for the Former Ironbridge Power Station proposal suggests that by the year 2036 their development will generate an additional 83 vehicle movements at the Gaskell Corner during the weekday peak periods. The number of vehicle movements is derived from the Telford Strategic Transport Vissum Model (TSTM). The TAA concedes that, even without the FIPS development traffic, the Gaskell Corner operates close to capacity, particularly on the A4169 Smithfield Road (now designated a strategic corridor) arm of the junction. (TAA paras 4.65-4.81)



18.6.1 When the FIPS traffic is included, the desirable ratio of flow to capacity (RFC) is exceeded in both morning and evening peaks, with (modelled) delays per vehicle of 72 and 105 seconds respectively on the A4169 arm. In fact, the modelling demonstrates that the delays per vehicle on the A4169 *more than double* when the development traffic is added on.

18.7 Crucially, the impacts and delays at this particular junction have been seriously underestimated in the TAA because the authors have not been instructed to include in the future-year forecasting of their Transport Model the impact from the proposed residential developments at Cressage (80 homes) and Tasley, Bridgnorth (1000-1500 homes). (*TAA Appendix A1.1*)

18.8 Whilst this forecast situation is a bad enough underestimation, it is also considered that the method of modelling, which was to use PICADY to model two separate junctions was not appropriate: one of the main issues with the operation of the Gaskell Corner junction is the interaction between traffic on *all five* of its arms. Separate PICADY models lack sophistication and therefore do not reflect this. A calibrated microsimulation model is the correct tool for this junction, producing visual outputs that are clear to professionals and public alike and reflect the movements of pedestrians and the numerous school buses as well as cars and lorries.

18.9 Notwithstanding these very important points, the TAA concludes that improvements at the Gaskell Corner junction will be necessary to accommodate the additional traffic generated by their development. This is hardly a generous conclusion considering that, as mentioned above, the delays to all queuing vehicles are doubled at the A4169 when their traffic is added in. This situation can only be further exacerbated by the traffic generated from the aforementioned developments at Cressage and Tasley. Annex 2d(iii) P 4



18.10 However, the TAA also acknowledges that the issue at the Gaskell Corner is not exclusively related to high traffic volumes. It is also the specific layout and design of the junction and the various movements through it.

*“As discussed above and in the TA, the junction is constrained and therefore the scale of any mitigation strategy will be limited.....”* (TAA para 4.75)

In order to provide *some* mitigation for the impact of their traffic on the Gaskell Corner the TAA provides two options for improvements (*drawing numbers ADC1776-DR011 P1 and ADC17776-DR-012 P10, see TAA Appendix A*)

18.11 Neither of the options had been tested or validated using any form of traffic modelling; therefore it is implicitly acknowledged by the TAA that their options will not resolve the problems at the Gaskell Corner. Nor does the TAA seek to quantify the impact of the additional delays (longer queues) on Air Quality affecting the homes and people adjacent to the A4169.

18.12 They have proposed a scheme that is designed to transfer queues to the Primary route (A458) from the A4169, or to implement a Yellow Box with ‘Keep Clear’ markings; whilst at the same time and with both options, failing to address the correct pedestrian desire-lines. On-site observations clearly demonstrate that the (limited) existing pedestrian crossing facilities are largely unused; they do not meet local pedestrian requirements and, as evidenced by the persistent damage to the safety railings, are dangerous. Annex 2b(iii) P4

18.13 Further to this, neither option appears to have yet been subjected to a Stage 1 Safety Audit, which is not surprising. It is therefore concluded that a full detailed assessment of the FIPS options is likely to determine that both are impractical and will not improve the situation at the Gaskell Corner.

Considering the above it is the view of the Refresh Group that improvements at the Gaskell Corner will not be forthcoming as part of the proposed FIPS development and that the

operation of the junction, for vehicles and pedestrians, will simply suffer further from the added impact of that development's traffic.

18.14 Using the same calculation from the FIPS TAA (*Appendix A Table 2.1*) to estimate peak period vehicle trips, the MW012VAR site would generate some 80 new movements during the peak period. A reasonable distribution of home-to-work trips from Much Wenlock to Shrewsbury, Telford and Bridgnorth (*based on the 2017-2018 Much Wenlock Town Profile*) would suggest that at least 60 of those trips would use the Gaskell Corner during the busy peak periods.

18.15 Clearly, this would exacerbate an already critical situation at the junction particularly with the additional traffic from the FIPS site. However, the answer to this problem for drivers leaving or heading to the MW012VAR site is straightforward; they will simply drive through the town itself to reach their destination, via the A4169 north of the Gaskell Corner. An obvious, but totally unacceptable (and avoidable) solution and one that is already observed whenever roadworks lead to increased delays at the junction. *Appendix 2d(iii) P 5*

18.16 Whilst it is true that a reduced proportion of this impact could, potentially, derive from the MW008 site, it will be smaller and therefore preferable to MW012VAR in terms of traffic impact. In these situations when junctions are constrained and mitigation is limited (and potentially undesirable), good practice indicates that it is through land-use *planning* that the issues are best addressed. If it is possible to physically minimise such an impact, then *plan* to do it. The development of MW012VAR, with its own delay-inducing roundabout access, negative impact at the Gaskell Corner and increased rat-running *Annex 2b(iii) P4*, is poor technical practice *and* poor planning.

'LPR Reg19 proposal (3.142. p64) includes the following,

18.17 Development on these 'strategic corridors' will be located in accordance with the following sequential preference:

- ii. Brownfield sites with direct access to the rail and road routes in the corridor

iii. Greenfield sites in exceptional circumstances,

Given that the route described through the Gaskell Junction is to be designated as a strategic corridor it is self-evident that the choice of development sites should be reconsidered. There being two readily available brownfield sites which would not further impact the Gaskell corner to the same degree as MUW012VAR

## **2. Public Transport**

19.1 With respect to public transport accessibility, the buses interchange in Much Wenlock at the junction of Queen Street and New Road. From this well-used stop it is possible to catch a bus to Shrewsbury, Telford, Bridgnorth and Wolverhampton (and travel onward by train from these towns). MW012VAR is over 1000 metres (12 minutes walking) from the interchange. The nearest bus stop to MW012VAR involves waiting at or crossing the A458 and waiting at an unsheltered stop. The formal pedestrian route from MW012VAR to this bus stop is approximately 580 metres (7 minutes). In contrast, MW008 is a maximum 300 metres (3.5 minutes) from the bus *interchange* and includes a formal signalised crossing of New Road on its route.

Clearly, MW008 is considerably better than MW012VAR in terms of public transport provision, and accessibility; in fact there is no realistic comparison.

## **3. Pedestrian Movements**

20.1 In terms of general pedestrian movements to access the centre of Much Wenlock, it is some 850 metres (10 minutes) from the MW012VAR site to the centre of Much Wenlock High Street, compared to some 450 metres (5 minutes) from MW008. In some guidance 850m is considered outside of the desirable maximum distance for pedestrian movements. The shorter distances are far more encouraging for people to walk in preference to taking the car; in particular those with some mobility difficulties will be more willing to walk to local services (shops etc) if the distance is short and more manageable for them. Therefore, once again it is clear that the site MW008 is preferable to MW012VAR.





#### **4. A458 Roundabout**

20.2 It has been claimed that a new roundabout on the A458 Bridgnorth road is “needed for gateway and calming purposes.” It is also proposed that this new roundabout will provide access and egress to the MUW012VAR residential development. It should be noted that a new roundabout in this location is not mentioned anywhere in Shropshire Council’s Much Wenlock and Surrounding Area Place Plan 2019-2020.

<https://shropshire.gov.uk/media/13891/much-wenlock-2019-20.pdf>

For the avoidance of doubt, the introduction of a brand-new roundabout is never actually a requirement, or needed, for gateway or calming schemes; in fact a roundabout in this location on the A458 would introduce additional noise, be detrimental to air quality, require street lighting and generate its own significant environmental impact whilst attempting to introduce an improved one in Much Wenlock.

20.3 Sensible, well designed gateway and/or calming schemes are not uncommon in Shropshire (designed by Shropshire Council Highways) and in many other places in the UK and the rest of Europe. Numerous case-studies and technical reports exist and are easily referenced. For example, speed reduction and gateway measures can be as simple as moving a 30mph sign; this can be reinforced with additional signing (eg countdown signing), slight road narrowing (with road markings) and landscaping that clearly confirms a change to the driving environment.

#### **Summary and Conclusion**

21.1 The above assessment indicates that the SC Preferred Site MW012VAR does not satisfy the Transport criteria identified in the 2019 NPPF, i.e.:-

*There are no obvious opportunities to develop sustainable transport modes from site MW012VAR (para 108a).*



*The significant impact from the site MW012VAR on the transport network in terms of capacity and congestion (Gaskell Corner junction) or on highway safety (pedestrian movements at the junction), or on reduced air quality, cannot be cost effectively mitigated. (para 108c)*

*The potential for rat-running through the town means that the preferred site has an unacceptable impact on highway (and pedestrian) safety. (para 109)*

*The preferred site does not provide access to high quality public transport and will require longer than desirable pedestrian journeys to the town centre. (para 109)*

It is concluded, based on existing evidence and the NPPF, that SC's Preferred Site MW012VAR should not be taken forward on transport grounds and that an alternative site MW008 is better suited in terms of reduced traffic impact, public transport accessibility and accessibility to the town centre for pedestrians.

## **22. 1 Planning for a 5 Year Housing Land Supply and the Redevelopment of the Ironbridge Power Station**

The adoption of the MWPP as an integral part of the LPR process means that the strategic redevelopment site at Buildwas (the former power station) is extremely important in determining the role of Much Wenlock in accommodating further housing and understanding the impact of growth in the area. The scale of the proposed development is especially relevant as it includes some 1,000 new dwellings.

22.2 This is a very significant level of change for the area and has a number of implications for Much Wenlock. Shropshire Council has previously stated it sees the housing provided by its strategic sites as 'additional' and a 'buffer' to the numbers required to maintain a 5 year housing land supply. As such SC tries to dismiss the redevelopment as not being relevant in determining an allocation for Much Wenlock and so says the town must have an easy-to-build large site to meet the demands of certainty. This is justified in turn by a fear that



unacceptable planning outcomes would occur if the supply is not evident. This argument is fallacious on a number of levels:

- The NPPF states that the 5YHLS is calculated at a county-wide level and all development sites are relevant; Ironbridge's 1000 houses are an integral part of the supply for the county
- The MWPP changes the nature of the planning unit being used by SC and must influence the role of the market town; if the MWPP is there to direct infrastructure investment, the town has a legitimate expectation that, for example, investment proposals would apply to Much Wenlock, especially where its infrastructure is being put under further stress. This isn't being proposed through the LPR; it is dealing with the plan making process as a purely site allocation activity and is not being strategic as demanded by national policy and its reliance on Place Plans as local infrastructure strategies.
- The demand for a 5YHLS is important but not the determining factor making planning policy; climate change, and sustainability the rest of the NPPF and the policies of the whole development plan framework must be a significant consideration
- The distinctive character of Much Wenlock [and all market towns] has been identified as crucial in determining the policy framework; it has been considered at previous local plan inquiries, is a driver of policies in the Core Strategy and throughout the making of the MWNP
- The LPR preferred site proposes development at a scale incompatible with the nature of the historic settlement and is additionally in an isolated position. The NPPF (para 79) advises against isolated developments and the Core Strategy sets out the terms for this in the county. These maps demonstrate the development boundary <https://shropshire.gov.uk/media/7601/s12-much-wenlock.pdf> and <https://shropshire.gov.uk/media/8503/samdev-adopted-plan.pdf> . The isolation of the site is against policy and this is exacerbated if the landowner's site proposals for 120

houses are taken into consideration. The development boundary does not include MUW012VAR.

- There have been other significant changes in context since the MWNP was made in 2014: changes to the NPPF which recognises the importance of a strategic approach to addressing flood risk and the emergence of a national strategy for flood risk management from the Environment Agency which aims to tie together flood risk responses to neighbourhood plans in a strategic and inclusive way

<https://docs.google.com/document/d/1x9blaNRJaMvrWXjhdC7k8M5dlpHXbjhyVj4afETZhzw/edit>

22.3 Since the SCI and the Core Strategy were adopted, we can note that a benchmark of good planning practice has been established that SC ought to follow. The MWNP was not only one of the frontrunner neighbourhood plans, it set a high standard for community engagement and consultation over and above that expected by the 'basic tests'. It was commended for its approach by the Assessor and also by Louise Brooke-Smith, past president of the RICS, in her pre-submission appraisal.

## 23. The character of the town

23.1 The description below is taken from the Much Wenlock Market Town Profile Winter 2017/18 published by Shropshire Council, it is important because it neatly encapsulates what is unique about Much Wenlock in the rural landscape of Shropshire. Whilst a 'key centre' for the purposes of the LPR, the reality is that Much Wenlock is a small medieval market town with a unique place in local, national and international history.

*Much Wenlock is a small medieval market situated between Shrewsbury and Bridgnorth. Much Wenlock sits alongside Wenlock Edge a narrow limestone escarpment that runs for 15 miles from Craven Arms to Ironbridge via Much Wenlock and was formed in a tropical*



*sea some 425 million years ago. Much Wenlock developed around an abbey which was founded around 685. This remained until the invasion of Danish Vikings around 874. In the 11th century a religious house was built on the same site. This was subsequently replaced by a monastery following the Norman Conquest. The town and monastery prospered until the dissolution of monasteries in 1539. The ruins of the site can still be seen today.*

*In 1850 the local surgeon William Penny Brookes was credited with introducing physical education into British schools which inspired the modern Olympic Games. The mascot for the 2012 London Olympic Games was named Wenlock in honour of the town's connection to the games. Today the town retains a number of black and white timber framed buildings with the Guildhall being noted as a fine Tudor building. It is a half-timbered building that sits in the centre of town and houses the courtroom and council chamber.*

23.2 It is roughly one third the size of Shifnal which is also designated as a key centre. It has no bank and limited public transport to Shrewsbury and Bridgnorth, and a risible public transport service to Telford, arguably the most important employment centre. Yet the quality of public transport is scored by SC as highly as Shrewsbury itself and drastic cuts to the hourly bus service to the county town were threatened by SC in 2019. It is a centre for the surrounding area but it is not an urban centre, there is nothing that would place it at the centre of strategic policy for the county. Yet it has been aligned to, 'Strategic Settlements', 'Strategic Sites' and The 'Strategic Corridors' identified in the LPR;

The Much Wenlock Place Plan (2.3 Summary of community priorities within the surrounding Area) identifies as the most important priorities for the community as;

- 33% each for transport and the natural environment
- 17% each for housing and local facilities

23.3 Much Wenlock is the thirteenth largest employment centre in Shropshire. 223 businesses have registered offices in the town (Source: MINT (Bureau van Dijk), July 2017)



which is less than 2% of the Shropshire total and approximately 1,000 people are employed in the town (0.9% of the Shropshire total).

### **23.4 Retail Economy**

*Retail accounts for 8.5% of total employment in Much Wenlock, which makes it the third largest employment sector in the town. 0.7% of all retail employment across the whole of Shropshire is absorbed by Much Wenlock.*

*Retail plays an important role in the economy of Much Wenlock, providing everyday amenities and shopping for local residents and serving as a shopping hub for the hinterland of the market town.*

*High Street Shopping, the retail sector assists in attracting visitors to the town by offering a range of independent traders providing fresh produce, gifts and household items. Within Much Wenlock there is a wide range of cafés, pubs and restaurants for residents and visitors. (Much Wenlock Market Town Profile Winter 2017/18)*

It is self-evident that the viability of the High Street depends not on distant employment centres but on a thriving tourist economy, which remains robust and valuable to residents and business in the town.

23.5 There is concern that so called 'strategic development' as proposed for Much Wenlock will open up a never ending expansion of which 200 houses is just the start. There is no indication of how this expansion relates to sustainability within the town and the desire to tackle climate change as expressed as far back as 2013 in MW Neighbourhood Plan. There is no local vision on the part of SC to underpin what is important and valuable to Much Wenlock and its residents, there is merely a convenient site allocation dressed up as 'strategic importance' to meet an arbitrary housing target.

### **24. What would a review of the MWNP look like?**



A full review of the Much Wenlock Neighbourhood Plan would give the next generation of residents of Much Wenlock an opportunity to form the town they wish to live, work, support and grow their families.

It would allow the community to consider what its ambitions would be;

An attractive, medieval treasure for people to visit, live and work in? with prospects of attracting visitors to the town with safe routes for cyclists and pedestrians?

Could we have a say in reducing the carbon footprint for Much Wenlock by allocating the best provision for growth at an agreed rate and perhaps release more land for building in places within walking distance to the shops and amenities?

New homes which genuinely meet the needs of the whole community rather than the needs of developers?

Has a by-pass now become necessary? And how can we ensure delivery of a town wide solution to flooding?.

Our community deserves the right to be part of the answer to all these questions and more.

Much Wenlock has exercised the rights to Royal Charters since the time of Richard 1.

Charters allowed communities the rights to self-government in a variety of different ways.

The MWNP is a modern-day equivalent of a Royal Charter and as such should not be easily dismissed.

## **SECTION 3**

### **Conclusions and Recommendations for changes to the Reg 19 Local Plan**

#### **Review**

##### **25. 1 Conclusions**



1. The LPR has been entirely driven by the desire of the Council to meet county-wide completion targets and has been aided by a landowner's scheme for development in Much Wenlock which would help to meet that target while also reducing Council expenditure by claiming to be able to 'fix' existing flooding problems and providing planning gain. The intent is clearly stated in S13. This is a scheme which is not endorsed by any part of the community, least of all by the residents whom it is alleged will benefit from the development.
2. The allocation proposed by SC in the LPR process started at 130 houses with a single site of 80 houses. This was supposed to meet local needs. The current version now says 200 houses and a site of 120. This number and the increase hasn't been justified anywhere. It came about because the landowner/developer advised SC they couldn't deliver a development commercially at a smaller scale than 120 houses.
3. The Reg. 19 Local Plan states (para 2.3) that the need for development will be determined in collaboration with local communities. Para 2.22 claims SC has carried out continuous and meaningful engagement. This is untrue and, sadly, little or no engagement has taken place with the community of Much Wenlock. Indeed we present evidence that it has been SC's intention from the start to leave resolution of dissenting views to the Examination in Public. As we have indicated above, after April 2019 the MWNP Refresh Group gathered together the feedback from the consultation events and further evidence into a Submission on the Local Plan Review. This can be found here:  
[https://drive.google.com/file/d/0B7rzkNUu4\\_1dHF3WVZ6SU9sR1hvd0NWUkZJUkJOUmFkWmlV/view](https://drive.google.com/file/d/0B7rzkNUu4_1dHF3WVZ6SU9sR1hvd0NWUkZJUkJOUmFkWmlV/view) . This submission sets out a clear representation of the views of the community, an update of the evidence base and options for delivering development in a way that would be appropriate for town. Despite the commitment in para 2.19 that the Local Plan is responding to the scale, needs and functions of Much Wenlock, this submission has yet to be commented upon or embedded in the LPR Reg 19 proposals. SC has failed to meet its self-stated and legally required objectives in its own Statement of





Community Involvement. It seems SC's consultation started and stopped with negotiations with the commercial developer who could provide the planning gains to fix SC's obligations as a flood risk management authority. Much Wenlock's needs have consequently been defined as wholly commercially driven. The Plan is unsound.

4. The LPR Reg 19 has shifted from the preceding Core Strategy in significant and detrimental ways. The new plan does not recognise the unique and fragile nature of the medieval town centre and ignores the significant risk, recognised for many years by all local authorities, that Much Wenlock will become a commuter town and overdevelopment will harm its future economic prosperity through tourism. The new plan (para 2.13) claims that the Place Plan and the Local Plan identify localised strategies for meeting community needs. There is, however, no strategy in S13 for identifying investment in the community's overstretched health services, boosting its thinly provided public transport, solving traffic congestion, enhancing its historic assets or even marketing the employment site required for delivering jobs and 'balanced' growth which addresses climate change. That these commitments are absent illustrates the lack of any strategic approach.
5. The one size fits all approach of imposing a single large site illustrates SC's ignorance of the made MWNP. The MWNP set out agreed community aspirations for the town and a policy approach that has, by common consent with SC (a review in 2017), delivered higher than expected levels of development. Early versions of the LPR didn't mention neighbourhood plans at all. The new plan does reference the MWNP but simply sets aside the key policy approach agreed just a few years ago. The policy approach endorsing limited development to meet local needs and housing to be delivered on smaller scale sites to suit the town's character has been dropped. It has done this without any justification and no public consultation. We have asked for an explanation from SC but none has been given.
6. By ignoring key aspects of the MWNP, SC sets itself against national planning guidance that requires local plans not to override the work done by communities in preparing their



NPs. Somehow SC interprets the NP for Much Wenlock as only being relevant for influencing details of design; this makes hollow their claim (2.29) to work constructively with local areas.

7. This is doubly mystifying however when the proposals for other key centres are considered (the Settlement Policies S1-18). Much Wenlock's sister settlements of Broseley, Bishops Castle and Cleobury Mortimer are expected to deliver 250, 150 and 200 houses respectively. Each of these places is bringing forward a neighbourhood plan and the Reg 19 Local Plan leaves it entirely to them to decide on the location and scale of development sites. The contrary approach adopted toward Much Wenlock is not explained (S13). Setting a target for development and then requiring a review of the MWNP to identify an appropriate location(s) and type of development would be entirely appropriate. Even the Town Council recognises the likelihood of a review of the MWNP at some point. We can only conclude that this would put at risk SC's commercially driven approach to securing planning gain through one negotiation.
8. We can be confident in concluding there is no risk of undermining the local plan by requiring development solutions to be brought forward through a review of the MWNP. Not only has Much Wenlock proven its ability to deliver an effective policy approach to achieving development, the town is, according to SC's hierarchy of settlements the next to smallest of the county's key centres. Its contribution is not a strategic one. Additionally, it is functionally related to the IPS redevelopment site (S20) delivering 1000 new dwellings. The risk of taking a short while to discuss the alternative approaches which might affect the 5 year housing supply is slight, SC has not even considered, agreeing on the best planning solution to deliver new housing, especially as the MWNP is effective to 2026.
9. Does the SC decision to avoid adopting a consistent approach toward Much Wenlock rest on the views of the Town Council? It is difficult to conclude that SC believes it responsible to drop an adopted plan policy based on one conversation with two or three councillors and in the face of known local opposition to its alternative? The audit trail of Town Council



decisions is confused; there are no written reports, no records of any local consultations and only limited endorsement of the LPR at any stage. It is becoming clear, however, that the Town Council were led to believe by the SC that the local plan would override the MWNP and take precedence; the option of setting a target for development and leaving it to a review of the MWNP was not offered.

10. We can conclude that the Reg 19 Local Plan proposal for Much Wenlock does not actually meet the tests set out in the policies (SP1, SP2, DP21 and others) and so will not deliver on the Vision (2.31). A single allocated site of 120 houses fails to meet all the elements of the key 'test' of SP1. Ignoring the MWNP has already meant community cohesion is not going to be delivered. The town's historic assets will not be enhanced by the imposition of a site. The proposals fail to mention the international importance of Much Wenlock in Olympic history as well as its medieval character, all assets that underpin a future tourism economy. The proposal chooses a site for 120 more houses which is isolated from services and facilities; the detrimental traffic impact on the town's medieval streets, the conservation area and the highway pinch point of the Gaskell Corner is inevitable and irreversible. There is no evidence offered that this will create a more sustainable settlement (SP2) or deliver on local needs, there is no infrastructure plan (part 5b) or strategy for traffic management and alternative transport which will address climate change. Similarly, the proposal to include Much Wenlock in a 'strategic growth corridor' is not explained or underpinned with evidence. If growth is to maintain and enhance Much Wenlock's role it needs to be appropriate and properly planned.

11. Likewise we can conclude that if SC applied the requirements of DP21 to their allocation MUW012VAR, it would fail their test. The site is in a rapid response catchment and in the most flood prone part of that catchment; this does not meet the sequential test. Alternative sites less at risk are available. MUW012VAR is only preferred because SC has negotiated planning gain. This is presented as a big win for the community but it is not a solution that has been discussed and is not considered deliverable even on its own terms. Yet a more



targeted solution to flooding at Hunters Gate not dependent on commercial development has been defined by SC in its Infrastructure Investment Plan and ignored by the LPR. The choice of MUW012VAR is based on a flawed site assessment process that contains inaccurate information. SC has not considered other options for development in the town. We can conclude that SC is at odds with both the national strategy for flood risk management and increasing resilience and its own Shropshire Local Flood Management Strategy (December 2015; <https://www.shropshire.gov.uk/media/6167/local-flood-risk-management-strategy-summary.pdf> Accessed 25th November 2020). We have shown there are alternatives and we can see that the Reg 19 Plan for Much Wenlock is in stark contrast to the integrated thinking that is described for the next smallest key centre of Craven Arms; here employment, housing and re-use of brownfield sites is clearly seen as an effective and viable approach.

### **25.1 Recommendation for changes to the Reg 19 Local Plan**

The MWNP Refresh Group is not objecting to new development and nor is it promoting a particular option or site for the town. This submission aims to reflect the stated expectations and needs of the community that should and must inform planning policy for the next 16 or more years that is covered by the LPR.

- I. **Set a development limit or target.** There is, therefore, a straightforward solution for Shropshire Council. That is to set the housing and employment target – which is the role of the local plan – and ask or (better still) work with the community to agree a solution. This can be done through a formal review of the MWNP using funds available from Government via Locality. A community-wide involvement in the review would deliver SC's commitment for meaningful community engagement. Under this overarching shift in the LPR, we therefore recommend a number of changes should be made to the Reg 19 Draft Local Plan:



- II. **The overall target for housing development in Much Wenlock should be reduced** from 200 to 165 by 2038. This would be consistent with the original Local Plan Review target of 150 houses to 2036 and reflect an annual rate of development consistent with the scale and character of the town.
- III. **The ‘preferred option’ site MUW012VAR should be deleted.** We propose that the exact scale, location and type of the additions to overall housing development should be addressed by the community through a review of the MWNP. This would ensure that the Local Plan treats all of its key centres consistently and fairly and that the local plan conforms to national policy on neighbourhood planning.
- IV. **Shropshire Council should show a commitment in the Local Plan to working with the community** to build trust and bring forward appropriate and integrated solutions to flooding, infrastructure and development needs. This for achieving the best use of land and delivers on the Tests set out in SP1 and other strategic policies for flood risk and climate change. The Local Plan should commit to using the established mechanism of the Neighbourhood Plan in Much Wenlock.
- V. **The Local Plan should include a commitment to undertaking a strategic flood risk assessment for the whole catchment** as a priority and that this will be used to underpin all future development policy and decisions. The Local Plan must avoid piecemeal and incomplete projects that are commercially driven and recognise the wider town and catchment problems experienced by residents and the town’s infrastructure. A catchment-wide review and solution is needed for the long term health and well-being of the community and to conform to both the NPPF and the Government’s National Flood Risk Strategy. We require that the Draft Plan commits to undertake a flood risk assessment for the whole catchment and that development proposals are considered in the context of clearly defined options for addressing the risks and securing long term resilience.



- VI. **The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan.** The lack of action in creating employment opportunities in a town designated as a key centre is remarkable. The release of the housing site(s) should be linked to the provision of employment opportunities in order to guard against the risk of unbalanced development. As with housing sites, the allocation should be subject to the flood risk assessment. However, the proposal to include Much Wenlock within a 'strategic growth corridor' should be deleted as this denies the reality of the town's circumstances and economic role as 'tourism destination'.
- VII. **The local plan should include a deliverable programme of infrastructure to meet the town's needs.** The Much Wenlock Place Plan recognises a range of development and infrastructure challenges, including a lack of health facilities, poor public transport, traffic congestion and flood risk. Yet the Draft Local Plan does not address or guarantee how these will be met. Shropshire Council's Vision stresses it will work with communities to prepare for and adapt to climate change, to deliver services and facilities and especially to secure the provision and delivery of affordable housing. None of these issues are addressed by the proposals in the LPR Reg19, yet they are inextricably linked to and required as a result of the development of substantial new housing at Ironbridge, Bridgnorth, Cressage and Much Wenlock itself. We suggest that a deliverable programme of improvements to Much Wenlock's local and associated strategic infrastructure should be identified and agreed with the community alongside funding arrangements.

## **Appendix 1: Consistent Ministerial support for Neighbourhood Plans directing the location and type of development**

### **August 2020:**

Housing secretary Robert Jenrick has announced funding targeted at helping urban and deprived areas create neighbourhood plans.

Government grants for individual neighbourhood planning groups will increase to £18,000.

This revelation comes after funding was increased from £9,000 to £10,000 in May to help groups deal with the effects of Covid-19.

The government intends for the money to strengthen the voice of local communities in some of the most disadvantaged areas in England. In addition to the money, the government will provide these groups with access to technical expertise free of charge. This could be help to access their area's housing needs or for developing masterplans.

Jenrick said: "The government is overhauling the country's outdated planning system to deliver the high-quality sustainable homes the country needs.

**"Under the new system local communities will be in the driving seat deciding what is built and where.** I want to ensure all communities have a strong voice in this process which is why I am doubling the funding available in some of the most deprived parts of the country to help residents in these areas shape the future of their neighbourhoods."

Councillor Sue Baxter, chairman of the National Association of Local Councils, said the additional grant funding for disadvantaged communities would provide a "vital" boost to help hundreds of areas prepare a plan.

"NALC would encourage local councils in those areas to use this additional funding to get started on neighbourhood planning to help build back better communities.

"Communities with an adopted neighbourhood plan in unparished areas are able to fast-track the process to set up a local council so they can also benefit from local leadership and support the wider benefits and ambitions of neighbourhood planning."

### **RTPI Planning Convention; June/July 2019:**

Communities feel like they are not being listened to on planning matters. How can we move from a place of confrontation to one of collaboration? Laura Edgar reports

Housing and planning minister Kit Malthouse MP signalled his support for long-term strategic planning. He wants local authorities to think not just five years ahead, but to envisage 10, 15, or 20 years ahead. When thought is given to that far ahead, he said, "you can address all sorts of concerns about infrastructure [and] housing. Show people that your plans are not ad hoc and responsive to a short-term political cycle". Malthouse said that during his tour of the country, he had noticed that it is those areas thinking about the next two or three years that are the ones running into trouble with local people.



“But those thinking about 20 years, 30 years, and showing a sense of vision, can satisfy many of the qualms about change that people naturally resist in their area.”

For Malthouse (pictured, right), planning is as much an art as it is a science. It’s the art of – “I hate to use the word compromise” – finding a way between “what the public think they want and need, against what they actually want and need, versus what you think they want and need”. If these things are poles apart, the system effectively collapses. “Politically it collapses, but from an acceptability point of view it collapses. But when the three combine it becomes incredibly powerful and a recipe for enormous success.” **“Show people that your plans are not ad hoc and responsive to a short-term cycle”.**

**Malthouse noted that resistance to change happens because “far too often people feel like victims of the planning system”. They feel like they are the least likely to be listened to. He was keen, he said, on neighbourhood plans to give communities a sense of control. “They should be able to dispose of their area as they see fit, because when you do that they relax.” Being involved leads communities to recognise that they do need housing because children and grandchildren are living at home, and they want the school to be full. “If they can see where it is, what it looks like, whether it is affordable, if they can control it through the neighbourhood plan, then acceptability rises.”**

MP Mark Prisk (pictured, left) agreed, saying he is a “strong supporter” of neighbourhood planning and that it should be strengthened.. He believed an important part of neighbourhood planning was that people needed the resources in order to be able to participate. “Where the community is engaged in complex masterplanning, funding their support should be an integral part of the process.” The chair of the All-Party Parliamentary Group for Housing and Planning also said the “old style” of consultation and inquiries should be replaced with a collaborative decision-making process. He had found the planning system to be quite closed off from people. Local plan consultations, for example, were increasingly done online “and I understand a need for that”. “But it is assumed that if it is up online then people will find it. Well, most do not. Or at least by the time they do it is too late.”

Prisk added that it was rare that such consultation led to substantial change in a plan’s core policies. Large-scale exhibitions for large-scale developments lacked a substantive mechanism for people to participate in the big discussions, which “only adds to public cynicism”. He gave suggestions on how to change this:



- An open data approach to the information that underpins the decisions. This does not mean just publishing it, but making sure that people are aware of it, know how to access it and also interpret it. He suggested that government and industry should jointly work with the Open Data Institute to establish best practice for future local plan-making and major developments.
- Move away from what Prisk called passive consultation to participation. Communities should play an active role in framing the decisions and perhaps framing the questions, and having power to effect that change.

### **The community debate**

Speaking with communities and trying to explain really complicated things was not an easy process, Sarah James MRTPI, membership development officer at Civic Voice, told a session on the community debate. “I know what it is like to think you can’t win whatever you do.”

Why would you want to engage with the angry wall at a public meeting? But she also said it can be collaborative, and she had seen this as part of her work with Civic Voice. “Communities are in it for the same reasons we are,” she said. “They want to live in great places.

A Civic Voice survey had found that making sure communities had the opportunity to understand proposals early was something community groups and civic societies wanted from their local authority.

“In reality, having 200-odd documents on an online planning portal – that’s great, that’s transparency, everything is out there – but how do we distil that into some key summary information?”

Tony Burton, convenor, Neighbourhood Planners.London, noted that it was hard to recognise the contribution that people can make. There was so much that people could offer that was not being tapped into.

### **"It does require us to rethink what is going on in the profession and its contribution towards well-being"**

“This is a convention of experts and yet the one thing they are not experts in is the local relationships that people have with their immediate surroundings, other than their own area.”

Dr Gavan Rafferty MRTPI, lecturer at Ulster University, highlighted the public’s increased awareness about well-being and how that was shaping local areas. “In Wales there is a lot of focus on the Well-being of Future Generations (Wales) Act. It does require us to rethink what is going on in the profession and its contribution towards well-being.”

From planners, Rafferty argued communities wanted a better understanding of the relationship between well-being and place. Neighbourhood planning was the direct route into the planning system, said Abbie Miladinovic, planner at Leeds City Council. Speaking about neighbourhood planning in Leeds, she explained that people don’t realise they are engaging with the process by sending a tweet or having a conversation in the village shop about the plan.

Miladinovic gave her top tips for neighbourhood planning, including the need to have belief. “I think that once you crack that, it shows a more honest side to your personality, a more honest side to your authority.” Getting that message across really helped to bring the community along with you, she added.

Like Burton, she also questioned whether the planner always knows best. “What I am speaking about is trying to acknowledge the different types of knowledge and the equal value of those different types of knowledge. It is only when you get the local knowledge of a community and the technical knowledge of a planner; it is only that combination that is going to prove successful.”

### **March 2018:**

Housing minister Dominic Raab has announced that communities across England will be able to get free access to expert advice and guidance to help make their neighbourhood vision a reality.

Housing minister Dominic Raab has announced that communities across England will be able to get free access to expert advice and guidance to help make their neighbourhood vision a reality.

The free help will include financial support and the latest planning expertise from trained professionals, to guide them through the process of preparing a neighbourhood plan.

Some 2,300 communities across England have started the process of neighbourhood planning, with 530 plans approved in local referendums.

**These plans will give local people a say in the development of their area, including where homes, schools and businesses should be built, and the infrastructure needed to support them.**

Raab said: “Neighbourhood plans are a powerful tool to help communities shape their local area, making sure the right homes are built in the right places. It’s vital that communities have the right support and advice available to help deliver a plan that meets their own ambitious aspirations.”

Previous government support has helped around seven out of 10 of these communities progress their plans, with 365 neighbourhood plans finalised using support provided by the government. The maximum grant available has been increased by £2,000 to £17,000, helping communities to access more resources to develop a plan for their area.

Community groups can find out more information about how to apply for funding on the [neighbourhood planning website](#).

### **November 2014:**

Ministers Brandon Lewis and Stephen Williams have announced that communities in England are to receive £23.5 million in funding to encourage them to get involved with neighbourhood planning.

Local people can draw up plans for their neighbourhood that can be used in determining planning applications and ‘neighbourhood development orders’ that grant planning permission, as well as being able to vote them into force in a referendum.

**Housing minister Lewis said: “With more than a thousand communities across the country already involved in neighbourhood planning this government is giving local people a real say in shaping what gets built where in their local area, and encouraging much needed new house building.**

“I now want to take this further, to get more people and communities involved in neighbourhood planning, and the £23 million I am announcing today will help many more community groups to bring their neighbourhood plans into reality.”

Much Wenlock Neighbourhood Plan Refresh Group  
Response to Regulation 19 Shropshire Draft Local Plan

The funding will:

- provide community groups with £1million during this financial year
- make available £22.5 million over 2015 to 2018. This will provide community groups with advice and grant funding to help get their neighbourhood plans into force following a local referendum.
- Provide £100,000 so community groups can organise neighbourhood planning workshops.

Communities minister Williams said: “Whether it’s allowing people to list a treasured local asset against sell-off, encouraging share offers to buy the local pub or getting people together to decide what should be built where, this coalition government is shifting power back locally.”

## Appendix 2:

### Shropshire Local Plan Review Reg. 19. 2016 – 2038

#### Much Wenlock –Options for Sustainable Development

##### Introduction

The Refresh Group's main submission

<https://drive.google.com/file/d/1iZMNHGs79zqhBmvYiTFCB7k9L9-lszDZ/view> sets out the case for why the Draft Local Plan's proposals should be rejected in favour of a community-driven review of the Much Wenlock Neighbourhood Plan (MWNP).

The submission shows that Shropshire Council has simply decided to put forward one commercial housing site to deliver development in Much Wenlock to 2038. To do this, Shropshire Council (SC) has, without explanation, set aside the key policy ambitions set out within the Much Wenlock Neighbourhood Plan (MWNP) 2013-2026. Through a straightforward call for land SC identified a number of sites that may or may not be suitable for development. SC has not undertaken any assessment of alternative development options for the town and has not discussed any alternatives with the community. The NPPF states that local planning authorities should under Local Plan Regulation 22 demonstrate transparently that necessary and legally compliant consultation has been undertaken during the course of plan preparation (in accordance with the published Statement of Community Involvement); and that the consultation responses have been noted, understood and, where applicable, taken into account in formulating the content of the plan under preparation.

[https://www.local.gov.uk/sites/default/files/documents/PAS\\_Reg%2022\\_April\\_2020.pdf](https://www.local.gov.uk/sites/default/files/documents/PAS_Reg%2022_April_2020.pdf)

It has also failed to take a strategic approach or evaluate alternative options towards policy.

Our submission also identifies a series of significant flaws and gaps in SC's site assessment. SC has not set out its reason for its choice of a single development site of MUW012VAR. Indeed the original Local Plan Review (LPR) proposal considered 80 houses was the solution for Much Wenlock. Only when the developer/landowner stated that they could not address flood risk issues with 80 houses did SC decide that Much Wenlock needed 120 houses and increased the total for the town from 150 to 200 representing a 15% increase in the size of the town. There was no justification for these changes in numbers except the strong steer (in January 2019 and subsequently) that SC was seeking to secure a financial gain to address flooding issues in the south of the town.

Alternative ways of delivering local needs, addressing Much Wenlock's wider set of infrastructure problems and which accord with the community's ambitions as set out in the MWNP were not considered.

##### **Aims of this paper:**

This paper aims to show alternative strategies exist and that it is quite possible to deliver development that meets local needs in a form that aligns with community aspirations and agreed current plan policy. We identify an example of a combination of development sites which make at least one alternative and viable option. This example, alongside others, could be included in a full review of the MWNP thus allowing the community to have its say on how to deliver its housing and infrastructure needs. Our starting point is to identify the local

needs and consider options in the context of current (statutory) MWNP policies and the (informal) Much Wenlock Place Plan.

### **Context - development needs or targets to 2038**

#### ***Numbers of dwellings***

The current Core Strategy and MWNP envisages a target of 130 houses between 2013 and 2026; at the formal review of housing delivery in 2017 it was established that the overall picture was that some 73 dwellings have been built or have been given permission to build since April 2013 up until 31st March 2017. This exceeds more than half the target suggested by the assessor. This means that by 2026 a further 57 houses would be needed. With an annual rate of development in MW of 8 dwellings per annum (through small sites and windfall) we can expect that a total of 129 will be delivered by 2026. That is, the approach taken by the MWNP is delivering the required target for the town. Since the 2017 monitoring review, the delivery of housing has been 55 from 2016-2018.

In addition, there was the delivery of 12 affordable dwelling at Callaughton Ash, on an exception site, in 2018. This arose from a MWNP policy H5 that committed the community to working with social housing providers; community representatives worked with SSHA/Connexus to deliver affordable homes for local people. This approach enabled the application of a local lettings policy which is not available through negotiating affordable homes as a percentage of market development.

The Local Plan Review of 2018 originally suggested a housing target of 150 houses from 2016-2036. The published Draft Local Plan now proposes 200 houses from 2016-2038. The need for a higher target has not been justified and is contested. The refresh group suggest a more reasonable target to 2038 would be a maximum 165 as this reflects the annual rates of development.

Connexus has an option on land to extend the exceptions site at Callaughton Ash and it is reasonable to anticipate a further 12-15 houses within the next 2-3 years. We can also note that Connexus also identified other potential developable exception sites in 2014-15.

Therefore, if we just consider the numbers of houses required, we can identify a likely residual or development target of at least 129 with a further 12 -15 affordable homes on exception sites then the reasonable target of 165 is achievable.

#### ***Comparison with other settlements in Shropshire and the case for no specific preferred site allocation in Much Wenlock.***

##### ***Appendix 1 Shropshire Local Plan 2016-2038 Regulation 19 Pre-Submission Draft***

The draft Local Plan shows Much Wenlock with a Residential Development Guideline of 200 units, the same as Church Stretton and Cleobury Mortimer. Much Wenlock has delivered more Residential Completions than these other Key Settlements in the period from 2016 to 2020, indeed ahead of the growth aspirations of its Neighbourhood Plan. Against the wishes of the overwhelming majority of residents who have expressed a view, and its Neighbourhood Plan, it has been given a Local Plan Site Allocation, in contrast to Church Stretton and Cleobury Mortimer which have no such allocation. Curiously, Church Stretton and Cleobury Mortimer each have a windfall allowance of 120 dwellings, while Much

Wenlock has a windfall allowance of only 27. Based on consistent progress since 2013, Much Wenlock will easily reach the figure of 200 within three years. With two sizeable brownfield sites within its development boundary, Much Wenlock's 200 Guideline is very likely to be breached before 2025.

In any event, the recent proposal for redevelopment on and around the site of the former Ironbridge Power Station includes plans to build 1000 new homes in the narrowing strip of agricultural land still separating Much Wenlock from Telford. To retain its character, and its historical role as centre for a large rural area of south Shropshire, Much Wenlock must avoid the kind of over-development currently proposed, which is not intended to meet local needs.

This appears to be inconsistent and illogical. A different approach is required, this papers sets out the possibilities of such an alternative approach below, which should include the same approach as taken in Church Stretton and Cleobury Mortimer

### ***Types of housing need***

Priority needs for local housing have been identified by local surveys, including those for the Much Wenlock Neighbourhood Plan. These established that the needs are twofold. The first is affordable homes, in the main for rent by local people. Second is a need for small, well adapted homes allowing elderly local people to downsize. These priorities will not be met by the allocation of a large market led housing site beyond the current development boundary.

In terms of evidence for the types of housing that are required, the Much Wenlock Refresh Group collected exhaustive evidence on housing needs for the community in a series of consultations throughout 2019/20 which can be found on the links below. These consultations were built on the formulas established by the community consultation in 2012 which under pin the MWNP.

It should be noted that by contrast Shropshire Council have not carried out a Housing Needs Survey. The most recent survey by a local authority was carried out by Bridgnorth District Council in 2006.

<https://sites.google.com/view/mwnprefresh/themes/housing>

<https://docs.google.com/document/d/1ZQeEhJQIgv7kbFvMN2BsvgoFnBGjbyxCL9nKxpTHjao/edit>

### **Methodology for identifying options**

We have used the following to inform alternative approaches.

- Shropshire Council's Much Wenlock Place Plan Area Site Assessments (August 2020) and in particular Appendix N, Stage 3 site assessments
- Site assessment used for the development of the MWNP in 2012-13
- Site Assessment and Allocations Toolkit, Locality, Feb 2020  
<https://neighbourhoodplanning.org/toolkits-and-guidance/testing-viability-proposals-neighbourhood-plan/>
- A review of traffic issues within the town (see Section 2 of our main submission)

- The policy framework set out by the community in the ‘made’ MWNP 2013 -2026 (see addendum )
- Community housing needs surveys (2012 and 2019/20) see <https://sites.google.com/view/mwnprefresh/home>

Shropshire Council’s Much Wenlock Place Plan Area Site Assessments identified a total of 16 sites in all capable of, according to its calculations of delivering a staggering 2476 houses. SC’s assessment was divided into 3 stages being solely determined as to the suitability of the site for development.

Each site assessment does not seem to include consideration of positive outcomes for the town or its limitations in terms of negative impact, only, it seems the ability to produce numbers of dwellings despite SC’s own Place Plan and the MWNP.

The Much Wenlock NP Refresh Group has reviewed SC’s published site assessments for Much Wenlock. This appraisal (that includes the sites noted below) can be found at [https://drive.google.com/file/d/1gTl8r9BR-E8y\\_lyxYLjMavyHuDx9N9Y3/view](https://drive.google.com/file/d/1gTl8r9BR-E8y_lyxYLjMavyHuDx9N9Y3/view) .

The appraisal notes significant inconsistencies in the assessments, for example;

- Assessments in Stage 2a; Sites 2-9 all have a Good grading, whilst MUW012VAR is graded as – 4 Fair
- MUW008 continues to be assessed as at flood risk when successful flood alleviation measures have been put in place.
- MUW012 is noted as being not in accordance with MWNP whereas MUW012 VAR is not recorded as being ‘not in accordance’ when it is the same piece of land.
- MUW012 and MUW012VAR are two pieces of land which when joined make a much larger allocation for a preferred site than the developer notion of 120 dwellings to provide flood alleviation required. This site assessment allows for a preferred site of 290 dwellings.
- Some sites take the impact on the Gaskell corner into account whilst others do not.

These inconsistencies and errors mean that alternative viable and more preferable options in terms of policy have been set aside. Even so, of the identified sites 11 reached stage 3 of the process as having most potential for development. SC has not explained how it decided only one particular site (MUW012VAR) would fulfil the needs of the community.

### **Example of an alternative development strategy for the town**

One possibility, among others is to consider the following three housing and one employment sites in combination;

- o MUW001 Morris Corfield (17units),
- o MUW002 Travis Perkins (11),

- o MUW008 Sytche Lane (334)
- o with potential employment site MUW011 C Stretton Rd (now reduced in size with an attenuation pond over much of its area).

Using the Locality based criteria for site assessment to show that there are suitable alternatives which, when grouped together, suggest a site assessment which will fall within the policies set out in of MWNP.

It is our belief that these residential three sites, in combination, offer a more flexible opportunity than Shropshire Council's current preferred site proposal at MUW012VAR.

The delivery of 12 affordable dwelling at Callaughton Ash, an exemption site, in 2018 shows that the community and Town Council can deliver affordable homes for local people by working directly with Housing Providers as an alternative to affordable homes as a percentage of market development.

In combination these would provide not only market development but include, in the process;

- one and two bedroom new homes to buy or social rent
- single level retirement living
- space for a new medical centre

All would have advantages of being;

- closer to the amenities in the town enabling easier walking and cycle journeys
- reducing unnecessary car journeys, congestion and the demand for parking
- reduced air pollution and helping to achieve Net Zero Carbon as declared by UK Government and SC's Climate Emergency
- relieving the imminent pressure on the highway network, especially the Gaskell Hotel junction
- designed to reduce surface water flooding risk across the town
- providing affordable housing contributions
- adding to a CIL pot which can help deliver a scheme to address existing flood risk at Hunters Gate

The methodology used here is based on the Appendix N, Much Wenlock Place Plan Area Site Assessments, August 2020, Shropshire Council (SC) focussing on Stage 3 assessments, in combination with the Site Assessment and Allocations Toolkit, Locality, Feb 2020. Showing compatibility with the MWNP 2013 -2026 policies.

An appraisal table including the above listed sites compiled by Much Wenlock Refresh Group can be found at [https://drive.google.com/file/d/1gTl8r9BR-E8y\\_lyxYLjMavyHuDx9N9Y3/view](https://drive.google.com/file/d/1gTl8r9BR-E8y_lyxYLjMavyHuDx9N9Y3/view)



Of the three residential sites included in SC site assessments, 001, 002 and 008 only MUW002 does not reach Stage 3. (Site Assessment 2020, SC) Indicating that 001 and 008 are viable whilst 002 was removed from the Site Assessment as 'not of suitable size' with no reason given.

### MUW001 Smithfield Works

**Number of dwellings:** 17 (with a maisonette style development this site could produce twice the number of dwellings)

**Type of land:** Brownfield - The development of brown field sites is prioritised where available and deliverable in sustainable locations. (MWNP policy H3 SC Core Strategy 2010 p85)

**Rating:** -6 Fair

**Accessibility rating** (this refers to the SC site assessment guidelines on distance from recognised facilities): 20 out of 24

This site is well with the Open Space, Sport & Recreation Interim Planning Guidance, SC, 22nd September 2010 guidelines. It is within ten minutes walking time to all the main facilities of the town and leisure facility.

**Proposed future use:** The site could encompass a new medical facility with adequate parking with the addition of market and affordable dwellings aimed at young first-time buyers and older residents wishing to down- size.

#### **Evidence:**

The Much Wenlock Refresh Group collected exhaustive evidence on housing needs for the community in a series of consultations throughout 2019/20 which can be found on the links below. These consultations were built on the formulas established by the community consultation in 2012 which under pin the MWNP.

It should be noted that by contrast Shropshire Council have not carried out a Housing Needs Survey. The most recent survey by a local authority was carried out by Bridgnorth District Council in 2006.

<https://sites.google.com/view/mwnprefresh/themes/housing>

<https://docs.google.com/document/d/1ZQeEhJQIgv7kbFvMN2BsvgoFnBGjbyxCL9nKxpTHjao/edit>

### MUW002: Travis Perkins

**Number of dwellings:** 11 (with a maisonette style development this site could produce twice the number of dwellings)

**Type of land:** Brownfield - The development of brown field sites is prioritised where available and deliverable in sustainable locations. (MWNP policy H3 SC Core Strategy 2010 p85)

**Rating:** 1 good

**Accessibility rating:** This site was not accessibility rated by SC it was considered to be too small for inclusion in further assessments, with no reason given, yet it is well with the Open Space, Sport & Recreation Interim Planning Guidance, SC, 22nd September 2010 guidelines. It is within ten minutes walking time to all the main facilities of the town and leisure facility

**Proposed future use:** . The MWNP Steering Group assessed this site in 2012 and considered it a suitable size for maisonette style retirement living due to its close proximity to the town and its ability to form a ‘gated’ community, should residents seek that added sense of security. Maisonette living would double the number of dwellings made available.

This site offers the possibility to move industry out of the residential area, where it currently places a huge imposition nearby residents without adding any notable local employment or services. Currently its main use is as a delivery depot. Site not included in 2018 SLAA

### MUW008: Sytche

**Number of dwellings :** 334

**Type of land:** Greenfield

**Rating:** -1 good

**Accessibility rating:** 17 out of 24. The Much Wenlock Place Plan site assessment document dated 2020 said that,

*the site is well related to the built form of the settlement, but occupies a visually prominent site with steep topography which has significant implications for surface water flood risk in the town.*

This assessment is out of date and has not been reviewed to include the positive effect on flood alleviation as a result of the attenuation pond now in place above the site. The SC Assessment continues to say that there is flood risk ignoring the success rate of the new alleviation ponds. In February 2020 there was a 100year flooding event with no flooding recorded at MUW008.

The Environment Agency flood risk map for the area of Much Wenlock: indicates MUW008 is flood low risk

### Traffic assessments

Traffic re assessments for the suggested sites including a comparison with MUW012VAR should be undertaken by SC

According to the Department for Transport as of July 2018, 45% of households in Rural Towns & Fringes have 2 or more vehicles, with an average of 1.39 cars per household. The data and local experience show that MUW012VAR would exacerbate traffic at the Gaskell Corner, and the bottleneck at Sheinton St. with local traffic trying to avoid both by ‘rabbit running’ through the town streets. Local experience shows that extraordinarily little

traffic emanating from MUW012VAR would turn left for employment in Bridgnorth, most would turn right to Telford, the M54 and beyond. By contrast traffic emanating from MUW008 would not interfere with traffic in the town to the same extent.

*43% of the population of Much Wenlock drive to work. The majority travel eastwards from MW to Telford, South Staffs, Birmingham, Sandwell, Dudley and Wolverhampton.  
Data relates to Mid Super Output Areas (MSOA) aligned as closely as possible to Shropshire place plan areas.  
Much Wenlock Market Town Profile, 2017-18, Shropshire Council*

The proposal by Shropshire Council to bring forward a Hunter's Gate extension scheme (MW012VAR) as its SLPR Preferred Site is flawed from a Transport and Accessibility perspective., page 28 of the Much Wenlock Refresh Group submission to SC contains a fuller assessment of the impact of MW012VAR and includes a comparison with a more suitable site, (MW008) which is closer to the town centre, and with considerably better pedestrian and public transport accessibility: not isolated outside the southeast limit of the town, (with its own roundabout access introducing delays, noise and street lighting onto the A458 Bridgnorth Road) and detrimental impact at the critical Gaskell Corner junction both in terms of congestion and air quality. This junction suffers from continual demand pressure which will be significantly increased by a minimum of 100 HGVs per day when the proposed mineral extraction at the former Ironbridge Power Station site commences.

Guidance in the NPPF and good practice stipulates that development sites should give priority to pedestrian and cycle movements; facilitate access to high quality public transport and whose impact on the highway network and safety can be mitigated. MW012VAR does not meet these standards whereas MW008 (as an example) does. In any event the decision on the Preferred Site should be made through the proper planning process, which in this case is a review of the Much Wenlock Neighbourhood Plan and a proper consultation with the people of the town.

### **Proposed future use for MUW08:**

The SC site assessments continue to insist on full development of this site there is no consideration of partial development. There could be up to 80 -100 homes on this site without significant disruption to the local landscape. Developing limited parts of MUW008 would not impact on the long- standing allotment allocation

In 2013 the MWNP Steering Group received a proposal to consider a site allocation of 25 homes on this site. The site has already been partially developed. It is already a development site and well with the Open Space, Sport & Recreation Interim Planning Guidance, SC, 22nd September 2010 guidelines. It is within ten minutes walking time to all the main facilities of the town and less than five minutes' walk time to the leisure facility. This site has been dealt with in detail in the Refresh Group document Site Assessment Comparisons.

[https://drive.google.com/file/d/1gTl8r9BR-E8y\\_lyxYLjMavyHuDx9N9Y3/view](https://drive.google.com/file/d/1gTl8r9BR-E8y_lyxYLjMavyHuDx9N9Y3/view)

### **Evidence:**

The Much Wenlock Refresh Group collected exhaustive evidence on housing needs for the community in a series of consultations throughout 2019/20 which can be found on the links below. These consultations were built on the formulas established by the community consultation in 2012 which underpin the MWNP.

It should be noted that by contrast Shropshire Council have not carried out a Housing Needs Survey. The most recent survey by a local authority was carried out by Bridgnorth District Council in 2006.

<https://sites.google.com/view/mwnprefresh/themes/housing>

<https://docs.google.com/document/d/1ZQeEhJQIgv7kbFvMN2BsvgoFnBGjbyxCL9nKxpTHjao/edit>

### **The case for no specific preferred site allocation in Much Wenlock.**

In addition to the options above there is one further option which could and should be put to the community during a review of the MWNP;

No preferred site allocation for housing is either necessary or desirable in Much Wenlock because –

- the notional annual target for house completions is already being consistently met
- exceeding the target and local need threatens to increase catastrophic flood risk
- the proposed site allocation is not designed to meet the type or scale of local needs
- the proposed site would create the largest development ever in the town's history
- the proposed site allocation would significantly alter the character of the town
- there are large numbers of market-led homes being built and planned nearby

### **Conclusion**

The Much Wenlock Refresh Group contend that Shropshire council has not paid significant attention to the needs of the town when opting for the 'preferred site' MUW012VAR. Whilst MUW012VAR is an option and should be considered in any future community-driven discussion about development futures, SC has given no reasons for its choice over other, we suggest, more suitable sites. Or, indeed the option for no large development site.

There is good reason to believe that there will be continued small site development in and around the town which will deliver a significant contribution to the target of 165 houses. Additional housing land in the order of 80-100 dwellings would be needed. This is not, however, just a matter of housing numbers; the development must help deliver the needs and vision of the community.

With the right development package being assembled, a combination (used as an example) of the three sites analysed above - MUW001, MUW002 and MUW008 - could provide for the housing needs of the community in all age groups. This could include a much-needed new medical centre, a positive contribution to Net Zero carbon, improved accessibility and the alleviation of traffic at the Gaskell corner. Bringing forward the development of employment land at MUW011 would also help drive forward future local job opportunities.

It is our belief that there are alternative approaches and combinations of sites which offer a more flexible and fulfilling opportunity than Shropshire Council's current preferred single commercially-driven housing site proposal at MUW012VAR.

A full review of the MWNP would allow the community to consider *all* development options in full. Our evidence base can be found in full at

<https://sites.google.com/view/mwnprefresh/home>

A combination of the three sites analysed above, MUW001, MUW002, MUW008, if carefully managed will provide for the needs of the community in all age groups. Including a much-needed new medical centre and a positive contribution to the alleviation of traffic at the Gaskell corner.

Our evidence base can be found in full at

<https://sites.google.com/view/mwnprefresh/home>

## Addendum

### **Housing: Our policies Much Wenlock Neighbourhood Plan**

**Policy H1** Affordable housing shall be provided at a rate of 20% of total yield on site.

**Policy H2** Housing developments within the development boundary of Much Wenlock will be permitted where they include a range of house type, including two and three bedroom dwellings. Housing developments will also be expected to include an element of single level dwellings and to meet the needs of the elderly and people with disabilities.

**Policy H3** The redevelopment of brownfield sites in the Much Wenlock development boundary for mixed uses, including housing, will be supported where it can be shown that an otherwise lawful use of the site is no longer viable.

**Policy H4** Housing infill development and the conversion of existing buildings to residential use will be supported where they contribute positively to local character and where they help to meet local housing needs. Within the conservation areas of Much Wenlock and Bourton infill development should conserve or enhance the special architectural and historic character of these settlements.

**Policy H5** Proposals for small scale affordable housing developments outside the Much Wenlock development boundary will be supported subject to the following criteria:

- ☐ they comprise up to 10 dwellings; and
- ☐ the proposals contribute to meeting the affordable and social-rented needs of people with a local connection; and
- ☐ the development is subject to an agreement which will ensure that it remains as affordable housing for people with a local connection in perpetuity; and
  - the proposals would not have a significant impact on the surrounding rural landscape and the landscape setting of any settlement in the plan area; and
- ☐ the development is appropriate in terms of its scale, character and location with the settlement to which it is associated.

Open market housing will only be permitted outside the Much Wenlock development boundary where this type of development can be demonstrated to be essential to ensure the delivery of affordable housing as part of the same development proposal.

**Policy H6** Proposals for housing development will be required to provide a minimum of two parking spaces per dwelling. Proposals accompanied by a parking provision of less than two parking spaces per dwelling will only be permitted if:

- ☐ alternative and reasonably accessible car parking arrangements can be demonstrated and which in themselves do not add to on-street parking; or
- ☐ otherwise acceptable and well-designed new build or conversion schemes in the town centre conservation area would be incapable of meeting this parking provision.

### **Sustainability**

These policies aim to contribute to sustainable development by:

Providing a sufficient quantity of good quality housing, which meets the needs of all sections of society.

Protect and maximise the benefits of Shropshire's cultural and landscape heritage.

Ensuring the efficient use of land and material resources.

### **Reasons for our policies**

**The Plan proposes a range of policies to deliver a housing target of 130 dwellings for the Much Wenlock town area in the Plan period (2013-26). This level of growth reflects both the Plan period and a balanced assessment of the future development of the town. In order to ensure that this level of growth is delivered the implementation of the Plan will be monitored on an annual basis. A review of the Plan will be carried out within three years of the making of the Plan.**