

20th February 2021

Shropshire Council,
Planning Policy & Strategy Team,
Shirehall, Abbey Foregate,
Shrewsbury,
Shropshire.
SY2 6ND

Dear Sir/Madam,

Submissions on the Shropshire Draft Local Plan under the Regulation 19

Please find enclosed a number of submissions on different aspects of the Draft Local Plan as provided for under Regulation 19. I would have liked to have confidence in submitting my comments by email. However, my submissions under Regulation 18 were not acknowledged. A number of the issues that I raised did not lead to amendment and seem not to be identified in the report on public submissions.

I regret to have concluded that on the basis of the evidence provided the Draft Local Plan should be regarded as both unsound and non-compliant in respect of Much Wenlock. It fails to respond to "objectively assessed need", is not justified by reference to alternatives, fails to protect the public from increased flood risk and is not consistent with national policies either in protecting high quality agricultural land or in promoting sustainability. I have detailed my reasons for coming to these conclusions in the attached documents.

Yours sincerely,

Howard Horsley

Shropshire Council:
Shropshire Local Plan



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:	Howard Horsley
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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: Policy: Site: Policies Map:

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 type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input 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.

Evidence Sources relevant to my submissions - (Submissions provided on continuation sheets) Much Wenlock Neighbourhood Plan 2014 - 2026 Halcrow Report to Shropshire Council September 2007 The Pitt Review 2008 Flood and Water Management Act 2010 Localism Act 2011 Neighbourhood Planning (General) Regulations 2012 Government Final Progress Report on the Pitt Review 2012 Environment Agency: Rapid Response Flood Catchment Dataset "Much Wenlock Integrated Urban Drainage Management Plan". Mouchel 2011 Richard Allitt Associates Report for Severn Trent on Hunters Gate flooding. 2015 Neighbourhood Planning Act 2017

(Please continue on a separate sheet if necessary)

Shropshire Council Draft Local Plan

Regulation 19 Submission by Howard Horsley

Legal Compliance (Two pages)

I believe that in Section S13, which relates to Much Wenlock, the Pre-submission draft of the Shropshire Local Plan fails the test of being “Legally Compliant” in several important respects. In particular, the Draft Local Plan, contrary to all the evidence, purports to reflect the policies and priorities of the Much Wenlock Neighbourhood Plan, as it is required to do under the Localism Bill. This claim lacks credibility in the absence of evidence to support it. The Neighbourhood Plan and numerous representations from within the community, supporting the policies and priorities of the Neighbourhood Plan, have been totally ignored at all stages of the creation of the Plan. No significant amendments have been made to earlier drafts despite the strong evidence of community opposition to the failure of the Local Plan to respect the Neighbourhood Plan or to comply with relevant legal obligations.

On housing, for example, the Strategic Planning Team developing the Local Plan has failed to acknowledge or respect the target for housing completions and the limits on the size of individual developments agreed with the community and endorsed by Shropshire Council in adopting the Neighbourhood Plan. Instead they have entered into detailed discussions with the agents of a single landowner and are attempting to impose upon the community a single “preferred site” development. During the consultation the target number of completions on the site has been increased without effective community consultation. This change would involve a greatly increased overall completions target and the building on a single site of many more homes than in any previous building phase in the entire history of Much Wenlock, which stretches back some 1300 years.

On flooding, those drafting the Plan have also failed to respect legal obligations deriving from Shropshire Council being the lead agency (LLFA) in managing local flood risk. Much Wenlock is designated by the Environment Agency as a Rapid Response Catchment in the highest category. This means that, in the case of any flash flooding, there is likely to be a serious and immediate danger to property and to life.

An enormous amount of evidence has been presented to the drafting team not only from local citizens but also by consultants including, Mouchel, commissioned by Shropshire Council. Several such reports show that the “preferred site” of the strategic planning team is not only liable to flooding but also contributes significantly to flooding elsewhere. Under these circumstances the planners are legally obliged to discount this site if there are other available sites not subject to such serious flood risk. Several such sites were included in the site assessment documents of the Shropshire Council but not adopted, despite their meeting Shropshire’s evaluation criteria. Despite all community representations, the latest draft still maintains that the “preferred site” should continue to be given priority.

A suitable and relatively easy solution to regular flooding on and adjacent to the preferred site has eluded Shropshire Council as LLFA for over a decade. Outsourcing this council responsibility through reliance on developer integrity and expertise is not acceptable. Recent examples including the “cladding scandal” have shown that safety cannot be securely delegated by a council. The illusion that the “preferred site” is appropriate is now maintained only by the ‘fig leaf’ of vague development guidelines.

In S13, on housing and flooding alone, this draft Plan clearly fails the test of legal compliance. I will, therefore, refrain from raising any additional legal issues.

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.

Delete from the Plan the preferred site -

"Land adjoining the Primary School and Hunters Gate, Much Wenlock (MUW012VAR)

Conduct a catchment wide assessment of flood risk and necessary flood prevention and attenuation works necessitated as a consequence of the designation of Much Wenlock by the Environment Agency as a "Rapid Response Catchment in the highest category."

Based on the above assessment undertake necessary works as the LLFA. Thereafter determine what level of additional development, if any, can be safely approved in the Much Wenlock bowl.

If further development can be safely envisaged, revert to the scale and nature of the housing provision approved in the Shropshire Council adopted Much Wenlock Neighbourhood Plan with a much smaller target for completions and a focus on sites which are small in scale and cater for local housing needs including affordable homes and homes suited to the elderly.

(Please continue on a separate sheet if necessary)

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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:

I consider that this is necessary in order to justify my detailed objections to the Draft Plan and to ensure that the evidence which I have presented at several stages of the consultation process is finally heard, rather than ignored, and is responded to in an appropriate manner.

(Please continue on a separate sheet if necessary)

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Signature:

Date:

Office Use Only

Part A Reference:

Part B Reference:

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Name and Organisation:	Howard Horsley
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Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

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| 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 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.

Evidence Sources relevant to my submissions - (Submission on Soundness is provided on separate sheet.)

Much Wenlock Neighbourhood Plan 2014 - 2026
Halcrow Report to Shropshire Council September 2007
The Pitt Review 2008
Flood and Water Management Act 2010
Localism Act 2011
Neighbourhood Planning (General) Regulations 2012
Government Final Progress Report on the Pitt Review 2012
Environment Agency: Rapid Response Flood Catchment Dataset
"Much Wenlock Integrated Urban Drainage Management Plan". Mouchel 2011
Neighbourhood Planning Act 2017
Much Wenlock Place Plan (Section 16 Local Plan Review, November 2018)

(Please continue on a separate sheet if necessary)

Shropshire Council Draft Local Plan

Regulation 19 Submission by Howard Horsley

Soundness (Two pages)

The Shropshire Draft Plan fails, in several respects, the tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF). S13, for example, is not positively prepared in line with Shropshire Council Policies, with the National Planning Policy Framework or with the Much Wenlock Neighbourhood Plan.

In S13, which relates to Much Wenlock, the draft proposes a “preferred site” which fails to comply with the basic principles upon which site allocation is stated to be based. Specifically, S 13 No 7 states *“Development proposals will be expected to positively respond to relevant policies and guidelines identified within the Much Wenlock Neighbourhood Plan, any other relevant community-led plans and any masterplans that are adopted by Shropshire Council.”* This principle has been contradicted by the choice of a “preferred site” which ignores the policies and principles within the Much Wenlock Neighbourhood Plan in terms of scale, the nature of the development and its neglect of the prioritisation of local housing needs for affordable homes and homes for the elderly. It is arguable that, taken entirely in isolation, this represents a fundamental failure of soundness in the draft Local Plan,

Sadly, in respect of S13, these examples are only the tip of the iceberg. The lack of soundness is clearly illustrated in the failure of the Shropshire Strategic Planning Team to consult directly with the public in Much Wenlock, despite specific invitations. This is disturbing given the extremely high and positive response rate from residents both during its creation and at a referendum on the proposals and policies encompassed within the Neighbourhood Plan. There has been no local public engagement by Shropshire Council to agree modifications. There has been negligible local dissent, in consultation on the Draft Plan, from the policies and priorities of the Neighbourhood Plan adopted by Shropshire Council. A high proportion of responses lent full support to the Neighbourhood Plan with few dissenting. In the light of this evidence a refusal to engage locally seems motivated by a fear of the response.

The Shropshire Draft Plan thus fails the tests of soundness in respect of being both “positively prepared” and “justified” in the case of Much Wenlock. This can, perhaps, be understood most clearly by close examination of the Much Wenlock Place Plan, updated in 2018. The part of the Draft Local Plan for Much Wenlock, S13, is headed “Much Wenlock Place Plan Area” yet the Place Plan is not mentioned at all in section 13.1 which is headed “Development Strategy: Much Wenlock Key Centre.”

This omission conceals significant discrepancies in the housing targets between the two plans as well as a major new development proposed within the Place Plan area. Cressage S13,2 is included and an additional 60 or more new homes are proposed. In the case of S13.3, Buildwas, one might be excused for assuming that no new homes are envisaged. The layout of the document, whether intentionally or not, fails to declare anywhere in S13 that an additional 1000 new homes are to be built on the site of the former Ironbridge Power Station, within Buildwas Parish. All of these new

homes will be built within a five mile radius of Much Wenlock. No single development proposal in the entire Draft Plan is likely to have a greater impact on Much Wenlock. This impact is totally ignored in proposals for Much Wenlock.

The redevelopment of the site of the Ironbridge Power Station is dealt with quite separately in S20. There is no mention in S20 that this site lies within the area covered by the Much Wenlock Place Plan. Moreover, although the Albert Edward Bridge, Local Wildlife Sites and Great Crested Newts are all accorded consideration in S20 there is no mention whatever of the serious impact of this development upon Much Wenlock, its residents, its traffic problems or its community services. In effect the crucial interests of the residents of Much Wenlock have been totally disregarded.

Even ignoring the Power Station site, an additional 120 homes on a single preferred site in Much Wenlock represents a greater than 12% increase in its size. This over-development in an environmentally sensitive area adjacent to the Shropshire Hills AONB is far in excess of the stated aim of the Neighbourhood Plan which is to respond to local need. Moreover, that figure does not include existing completions and others already in the pipeline within the timeframe of the Neighbourhood Plan. These homes, often responding to local need, have all been, or are planned to be, delivered without resort to any specific externally determined "preferred site".

When considered together all these new homes represent a huge additional demand upon the local infrastructure which detailed evidence has already shown to be over-burdened in numerous respects. The Draft Plan could, therefore, only be regarded as 'sound' if it balanced new homes with new jobs and with a greatly enhanced local infrastructure. This would need to include additional secondary school places, a much expanded medical centre and major improvements in sewage disposal capacity, water supply, public transport and traffic management. The Plan must be regarded as seriously unsound in that it includes no evidence that these issues have even been fully understood or articulated, let alone adequately addressed or financed.

A lack of soundness is also clear in S13 5.180 which states that "Surface water flooding can develop very quickly in this situation and the potential impact on flood risk is therefore a very significant local consideration, including in the manner in which development sites are identified." It is symptomatic of the Draft Plan's lack of soundness that this statement is made, without irony, when the sole site identified as the "preferred site" for new housing in Much Wenlock is not only subject to flooding but is acknowledged, by Shropshire Council, as contributing to flooding elsewhere. Despite this, Shropshire Council has failed to take the preventative actions to alleviate the situation off-site as recommended by its own consultants, Mouchel, in 2011.

A further fundamental unsoundness in the Draft Plan is the lack of any clear analysis of the reason why Much Wenlock was subsequently designated by the Environment Agency as a Rapid Response Catchment in the highest category. Without such a coherent analysis, based on a detailed understanding and articulation of the geology, geomorphology and hydrology of the area, it is simply not possible to assess whether any additional development, let alone as many as 120 additional homes, could be safely built in the enclosed and elevated bowl within which Much Wenlock lies.

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.

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Approve, fund and monitor a review of the Much Wenlock Neighbourhood Plan before proposing major changes to the principles and policies encompassed in the current Much Wenlock Neighbourhood Plan.

Align the proposals for Much Wenlock in the Local Plan with the data in the Place Plan and make adjustments to the proposals for Much Wenlock based on an analysis of the impact upon Much Wenlock of the the more recent proposals for the redevelopment of the site of the Ironbridge Power Station.

Delete preferred site MUW012VAR from the plan as inconsistent with the LLFA responsibilities of Shropshire Council and unsuitable for development prior to action following a whole catchment survey of flood risk.

Commission a catchment wide survey of the flood risks implicit in the designation of Much Wenlock as a "Rapid Response Catchment in the highest category" identifying the geological, hydrological and geomorphological factors which contribute to the high risk of flooding, so as to guide future plans.

Plan only for further development in Much Wenlock consistent with eliminating increased flood risk.

(Please continue on a separate sheet if necessary)

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Signature:

Date:

19/2/21

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Council:
Shropshire Local Plan



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(Please tick one box)

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

Paragraph:	<input type="text" value="2.27"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text" value="S13"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
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Shropshire Council has undoubtedly attempted to comply with the duty to co-operate but appears not to have done so in a manner that promotes sustainability. It seems to have interpreted the duty to co-operate narrowly as a duty to meet an obligation to provide homes beyond the externally set target for Shropshire. In a letter to me dated the 30th October 2020 on behalf of the Chief Executive of Shropshire Council, Jane Trethewey, Assistant Director, Homes and Communities, stated that "the draft housing requirement for Shropshire incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, where evidence indicates housing delivery opportunities are constrained." This is a curious, not to say spurious, argument which lacks any appropriate context of institutional memory.

The "historic" County of Shropshire, once designated Salop, has provided the West Midlands conurbation with enough land within Telford to build homes for an "overspill" population of almost 100,000. Some of that land, acquired in the 1960s, is still being released for the building of new homes. By far the majority of the several thousand homes built in Telford in the last two decades have been built within a ten mile radius of Much Wenlock. That building programme continues and is to be supplemented by a further 1,000 homes on the site of the former Ironbridge Power Station and within the Much Wenlock Place Plan Area.(continued)

(Please continue on a separate sheet if necessary)

Regulation 19 Submission by Howard Horsley

Compliant with the Duty to Co-operate (continued)

The excessive proposal for housing completions in eastern Shropshire is compounded by the large part of eastern Shropshire protected by lying within the Green Belt. This zone maintains a stretch of open country between the West Midlands conurbation and the new city of Telford. What is patently lacking is provision for any similar stretch of open country to ensure the continued separation of Telford from Shrewsbury. In the early years of the development of Telford there was a determination, shared by all parties, to secure access to open countryside in this area for the residents of Telford. Policies protected both the integrity of local communities and the nature of the landscape. Currently, in contrast, there is unwarranted pressure to build more homes over and above local need in those areas not constituting Green Belt. Much Wenlock is a prime example of a settlement now expected to contribute to these excessive housing targets and in doing so progressively lose its unique and historic character.

The proposed "preferred site" in Much Wenlock, combined with completions already delivered or planned would produce many more homes than required to meet local need. It seems, frankly, absurd to suggest that locations in the eastern part of Shropshire, such as Much Wenlock, should countenance the loss of good quality agricultural land, such as that designated as the "preferred site" in Much Wenlock, in order to meet the needs of the "emerging Black Country Plan". The National Planning Policy Framework gives priority to the reclamation of sites which have been previously used. Such "brownfield sites" are far from lacking in the designated zone for the "Black Country Plan" where land hungry industries have long been in decline.

The preference of house builders for "greenfield sites" is well established but it is one purpose of the planning system to protect scarce and irreplaceable good quality agricultural land as a national resource. It is also a requirement that cooperation with neighbouring authorities should be consistent with achieving sustainable development. The type of cooperation proposed by Shropshire is inimical to promoting the national aim of sustainable development and would have the effect of increasing commuting and undermining the sense of community in Much Wenlock. Its undeclared aim in Much Wenlock seems to be to provide an increased council tax base for both Shropshire Council and for the Much Wenlock Town Council.

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.

While non-compliance with the duty to co-operate is regarded as incapable of modification at examination those modes and features in which non-compliance is expressed are capable of modification.

In so far as I have merely drawn attention to those elements of the plan that suggest a narrow interpretation of the duty to co-operate, rather than an absolute failure, I would propose modification as follows -

Remove from the plan all targets of housing completions over and above those required to meet local need and any externally required targets to meet a national need which can be justified by increased employment opportunities and by the use of brownfield sites.

(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.

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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:

I feel it is necessary to participate in order to ensure that a historical perspective is provided for the deliberations on land use policy in Shropshire.

(Please continue on a separate sheet if necessary)

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