

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:	Edwards
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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" value="ALL"/>	Policy:	<input type="text" value="S13.i"/>	Site:	<input type="text" value="MUW012VAR"/>	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 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.

Attempts to demonstrate meeting the objectives of the Much Wenlock Neighbourhood Plan (MWNP) are pure rhetoric. The Localism Act 2011 was enacted to make the planning system more democratic and more effective to ensure that decisions about housing are taken locally. The MWNP was developed to enable people in Much Wenlock play a much stronger role in shaping the area in which they live: this has not been the case in the Draft of the Shropshire Local Plan. (DSL) The MWNP sets out clear objectives with the focus being on small scale developments, in character with existing housing, which can meet local needs, giving priority to affordable homes and homes suitable for the elderly:
(Please go to continuation sheet Edwards Q4 (a) re.legal compliance)

(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.

- Withdraw site allocation MUW012VAR from the Plan and include for smaller sites, outside the flood zone, in accord with the Much Wenlock Neighbourhood Plan. Embrace the Localism Act 2011 and deliver its objectives, particularly with regard to the Neighbourhood Plan, and this will make the Local Plan more democratic and ensure that housing decisions reflect local peoples wishes.

(Please continue on a separate sheet if necessary)

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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:

(Please continue on a separate sheet if necessary)

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Signature:

Date: 23-02-2021

Office Use Only

Part A Reference:

Part B Reference:

Edwards Q4 (a) continuation sheet re. Legal Compliance

: these objectives have been totally ignored in the DSLP by allocating a single site solution allocating 120 houses on a flood prone site which is contrary to principles set out in the DSLP. I believe by ignoring the aspirations set out in the MWNP it makes a mockery of local democracy and totally disregards legal requirements set out in the Localism Act 2011.

The Local Plan identifies Much Wenlock as a Flood Rapid Response Catchment in the highest category. My understanding from the Rapid Response Briefing Note issued by the Environment Agency dated September 2015 is that the area is designated “a very high risk rapid response catchment” The Note identified the areas at particular risk, this includes the area of site MUW012VAR where the risk is described to be to life and property: but it does not extend to the complete Town area. It is recognised that “surface water flooding can develop very quickly in this situation and therefore a very significant local consideration” Why then allocate a site within the area at particular risk when other sites, that are not similarly affected and in accord with the MWNP, can be available, during the lifetime of the plan?

Even more so is the proposition to delegate the solution to flooding to a developer. Houses were damaged by floods in Hunters Gate in 2007 and 2020. Over that period there seems to have been little evidence of a firm commitment by Shropshire Council (SC) to identify the cause and identify possible solutions as required in the Flood and Water Act. 2010 I believe the Council as a risk management authority has ignored its legal duties toward the National Flood Risk Strategy: in my view it has compounded this dereliction by not complying with its own policies in avoiding development on land at risk of flooding: Prior to the existing development of Hunters Gate development warnings were given about risk of flooding. These were not correctly addressed and as a consequence houses in Hunters Gate have been flooded. I understand the developer was involved in the flood defences on that site I do not want history to be repeated with all the misery and distress caused by such events.

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

Paragraph:	ALL	Policy:	S13.1	Site:	MUW012VAR	Policies Map:	S13
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In my view the Draft of the Shropshire Local Plan. (DSLPL) is unsound in many critical areas such as housing need ignoring peoples wishes as set out in the Much Wenlock Neighbourhood Plan (MWNP) allocating a site within a flood zone and developing outside the town boundary on good quality agricultural land and is a contradiction to recommendations made by examiners at two previous enquiries. There is recognition of need to upgrade the infrastructure but little evidence of how this can be achieved I suggest that the proposed site development is unsustainable. Please refer to Edwards Q4 - continuation sheet re. Sound - NO

5/12/2

(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.

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Withdraw site allocation MUW012VAR from the Plan and replace with smaller sites, outside the flood zone, in accord with the MWNP. Identify brownfield sites and develop a programme based on actual local need. The MWNP sets out clear objectives with the focus being on small scale developments, in character with existing housing by giving priority to affordable homes and homes suitable for the elderly. Such an approach will avoid conflict with both SC's and central government policies regarding the need to protect good quality agricultural land from inappropriate and unsustainable development proposals.

(Please continue on a separate sheet if necessary)

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Part B Reference:

Edwards Q4 - continuation sheet re. Sound - NO (page 1)

Starting with housing need the Government has assessed the need for Shropshire as 25894 dwellings whereas The assessment in the Draft Shropshire Local Plan (DSLPL) is 30800. I cannot see any justification for such an increase and suspect it relates to an opportunity to gain revenue against actual need. A consequence of such an undemocratic approach is to cause overdevelopment above need: a case in point being the allocated site MUW012VAR.

“New housing and employment development will respond to local needs” is bogus in that it purports to justify a development of 120 houses in the DSLPL: such a number is well in excess of local need and is in total disregard of the principles and objectives set out in the MWNP. Up to early 2020 in a previous submission an allocation of 80 dwellings was included within a Residential Development Guideline (RDG) for 150 dwellings: this was given a hostile response due mainly to its lack of regard to the MWNP. Seemingly overnight without any consultation with the community the RDG was upped to 200: my understanding being that the developer required at least 120 dwellings to make the site commercially viable. I contend such an action demonstrates the required number of dwellings is developer led and not local need. I would argue that this makes the DSLPL unsound in respect of this site allocation.

Turning now to the suitability of the site for development. The DSLPL seems to have little regard to SC's stated policy of not building in flood prone areas. There is no evidence of how risk of flooding is to be assessed and of mitigation to prevent it. I cannot see how floodwater can be taken from the site and not deposited elsewhere in contradiction of another SC policy. In short the site floods, photographic evidence is available that shows many events over the last 12 months: the DSLPL seem to have ignored such evidence in the hope that a developer will solve the problem. I have no confidence in this approach based on previous experience.

I suggest that the DSLPL does not meet the National Planning Policy Framework (NPPF) with regard to the natural and local environment. SC has a responsibility “to protect the best agricultural land” In the Site Assessment-Stage 2B for site MUW012VAR the land is described as “in agricultural use for fodder/arable crops”. This to my mind is intended to imply land of poor agricultural quality whereas the reality is that it has an agricultural land

classification (ALC) of 4.4 Subgrade 3a – good quality agricultural land. See MAFF ALC survey map ALCW00299. I believe that by putting this site forward within the DSLP, SC has ignored its responsibilities as an LPA to protect the best and most versatile agricultural land from significant, inappropriate or unsustainable development proposals. In my view the site assessment is totally flawed making the site selection unsound. In addition, the indicative capacity of the site is shown as 176 dwellings, which in itself is worrying particularly when bearing in mind already stated increase in the number of dwellings on this site to meet a developer's commercial viability.

It is a known fact that the Town's existing infrastructure is overstretched to near breaking point in some areas. These include schools, the medical practice, water supply, drainage, sewage, traffic congestion on narrow roads. Lip service is paid in the DSLP to recognising the need to address problems that such a large development will cause. The DSLP offers no practical solutions to show how any necessary upgrading will be achieved or funded. A lack of appreciation as to the extent and their solutions I would argue makes the allocation of MUW012VAR as unsound: as there is no indication of how the significant impact of imposing such a large scale development on existing infrastructure will be dealt with: this is typified by SP2-5 which states "Principal and Key Centres accommodate significant well-designed new housing and employment development, **supported by necessary infrastructure**" Should this historic town and its unique landscape setting be permanently damaged by such unjustified and reckless pursuit of a site to meet a land owner and developers needs without any clear and detailed means of resolution to the many problems that will be created demonstrates, yet again, the unsoundness of site MUW012VAR.

I do not believe a single site solution of 120 dwellings (with possible supplementary extension to greater numbers) is sustainable. All that is on offer for employment is a site on the other side of the Town: This site has been included previously with little or no take up. The reality is that Telford is a more attractive option with better communication and incentives to employers as are other towns in the region. The allocation of 120 dwellings in the DSLP is unsustainable it will not bring employment to the Town and as a consequence

Much Wenlock will become a dormitory to the larger conurbations: people will travel by car thereby increasing pollution and carbon footprint which conflicts with SC's green policy and stated policy for climate change in the DSLP. Because of distance from the site to the Town: there would be more car movements within the Town's overcrowded road network further adding to the DSPRs lack of meeting green objectives in nominating this site.

Little mention is made in the DSLP of the impact on Much Wenlock of the 1000 dwellings at the former Ironbridge Power Station site at Buildwas which incidentally is within the area shown in the Much Wenlock place plan S13. It seems strange that the impact of such a significant development has not been raised directly within S13: the development of this site alone will have a huge impact in demand for services in Much Wenlock and the local road network particularly at the Gaskell corner, a known traffic jam location, that will encourage further rat runs through the towns streets thereby causing more misery to residents. The fact that the impact assessment of including a further 120 dwellings is to my mind remiss and serves to further demonstrate that the site selection MUW012VAR is unsound.

Finally I suggest after taking all the above into account site allocation MUW012VAR would certainly fail the Shropshire Test! It should be withdrawn.