

Eddie West
Local Plan Team Leader
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

By email only:
Planningpolicy@Shropshire.gov.uk

Our Ref: SA25881/ST/ML
Date: 1st February 2021

Dear Eddie,

Shropshire Local Plan – Regulation 19 consultation

Our clients, Wenlock Estates, have the following comments on the emerging Shropshire Local Plan. For your ease of use these are also replicated on the attached forms:

Part A: Consultees' details

Part B: representations on:

- Policy: Settlement Policy S13.1 - 'Development Strategy: Much Wenlock Key Centre'
- Policy: Settlement Policy S13.1(i) - 'Residential Allocations: Much Wenlock Key Centre'
- Policy Map: Inset S13 – 'Much Wenlock'
- Site: Local Plan Residential Allocation – 'Land adjoining the Primary School and Hunters Gate, Much Wenlock (MUW012VAR)'

Settlement Policy S13.1 - 'Development Strategy: Much Wenlock Key Centre'

This policy is supported as it recognises the role of Much Wenlock as a service centre for a large rural hinterland and its location on a 'strategic corridor' (the A458). Paragraph 3.142(a) of the Plan identifies that the A458 is a Strategic Corridor and Policy SP14: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major employment development". Whilst criterion 4(a) of policy SP14 recognises that, in

order to achieve a sustainable pattern of development, employment growth in these corridors will need to be balanced with an appropriate level of housing growth.

Given the above, it is evident that Much Wenlock should be a significant centre for growth in Shropshire, both socially and economically.

The identification of land to the south-east the town (allocation MUW012VAR) is also supported as this land is unconstrained, lies in a highly sustainable location and will deliver substantial community benefits both on and off site by way of flood alleviation. The land will therefore make a significant and unique contribution towards meeting the growth needs of both the Town and the County.

Settlement Policy S13.1(i) - 'Residential Allocations: Much Wenlock Key Centre'; Policy Map Inset S13 - 'Much Wenlock'; and Local Plan Residential Allocation - 'Land adjoining the Primary School and Hunters Gate, Much Wenlock (MUW012VAR)'

Settlement Policy S13.1(i) - 'Residential Allocations: Much Wenlock Key Centre', Policy Map Inset S13 - 'Much Wenlock' and Local Plan Residential Allocation - 'Land adjoining the Primary School and Hunters Gate, Much Wenlock (MUW012VAR)' are supported.

The site is a strategic allocation and would make a significant contribution towards the overall housing requirements for Much Wenlock up to 2038. We note and accept the development guidelines set by the Council and would comment as follows on the key issues:

The allocation of land within the town

A continuation of the existing strategy, to rely on windfall and exception sites to meet the needs of the settlement over the Plan period would fail to recognise that, without amendment to the development boundary of the settlement, windfall sites are a finite and diminishing resource and a significant reliance on such sites to meet the needs of a settlement is therefore considered to be wholly inappropriate. This is especially true for a settlement with the strategic importance of Much Wenlock but where the delivery of sufficient windfall development is problematic due to the unique character of the town and the numerous constraints to such development such as flooding and highway access.

Given the above, significant reliance on windfall development to meet the needs of the town over the Plan period is considered inappropriate.

In addition, and significantly, the provision of development on small sites fails to provide the scale of development necessary to either trigger the requirement for or generate a sufficient level of financial return to enable the provision of benefits such as those associated with proposed allocation MUW012VAR including affordable housing, a flood alleviation scheme and transport infrastructure improvements.

It is therefore considered essential that land is included within the development boundary of the town and allocated for residential development to ensure that the housing needs of the settlement and surrounding area are met, that existing issues

with the built environment may be addressed and, consequently, that the aims and objectives of the Plan are realised.

As previously detailed, the development strategy for Much Wenlock as detailed within Settlement Policy S13.1 is therefore supported.

Drainage and Flood Risk

In respect of the drainage infrastructure an initial flood modelling study has been carried out by McCloys Consulting and is submitted in support of this representation. McCloys are an industry leader in the water and environmental engineering sector. The aim of this study was to review the local flooding issue with a view of exploring what land take would be required to attenuate water entering the site from the wider catchment.

The summary of the study is as follows:

- 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.
- It is predicted that we would need to attenuate between 10,000m³ to 30,000m³ of flood water on site if discharging this at a controlled rate. As an attenuation pond of this size would take up so much space, this makes the development proposal in its current form completely unviable.
- The existing STW surface water drainage networks for the existing sites are at capacity even without any flood water entering them. Connecting the site to these networks in their current form would not be accepted by STW.
- To deal with the above point, a new surface water drain/culvert would be required under the Hunters Gate adopted roads and would need to discharge to The Parks. Alternatively it may be feasible to upgrade/replace the existing STW surface water sewer here. In either case a very large pipe is required and costs will be substantial.
- As a ball-park figure, we estimate the cost of constructing the culvert and attenuation features as being in the region of £1,000,000. This would need to be carried out very early on in the development prior to any house sales.

The initial flood modelling study undertaken by McCloys Consulting has therefore identified drainage infrastructure, including a culvert and attenuation features, that will not only accommodate proposed development on the site but also alleviate existing problems experienced with the significant volumes of water that run across the site and into the adjoining Hunters Gate development.

Given the above, it is considered evident that the proposed allocation of MUW012VAR will enable the provision of surface water drainage infrastructure that will provide a betterment by alleviating the risk of flooding in this area of the town and will assist in mitigating the effects of climate change

Highways and Transport Infrastructure

We recognise that development on this scale will require a new roundabout access to be provided from the A458. The proposed roundabout access, whilst providing a safe access into the site, will also provide a gateway feature and assist in slowing

traffic entering the town. The roundabout is therefore considered to provide a significant betterment in terms of highway safety along the A458 through the town. In addition, as detailed within the Department for Transport's Local Transport Note 1/07 'Traffic Calming' (March 2007), such traffic calming features can result in improvements in quality of life arising from reductions in noise, vibrations, community severance and vehicle emissions.

It is recognised that there are issues associated with the existing highway infrastructure in the town, most notably at the Gaskell Corner Junction, and that MUW012VAR is further from the town centre than other sites promoted for development. Nonetheless, site MUW012VAR is within an acceptable walking and cycling distance of the town centre and will therefore promote sustainable forms of travel. It is therefore considered that the allocation of MUW012VAR will give rise to no greater an impact upon the existing highways infrastructure than the provision of this level of housing growth distributed elsewhere in the town. Whilst the allocation of site MUW012VAR does, significantly, provide a unique opportunity to secure significant highway infrastructure improvements, as detailed previously.

The cost of a roundabout to the A458 will be substantial, although the precise design is unknown at this stage and a supporting transport and highways assessment will be required as part of any future planning application. This will fulfil the first of the proposed development guidelines.

Other Matters

At this stage we have carried out a massing exercise and can confirm that the site can accommodate a maximum of 120 dwellings together with the required roundabout and drainage infrastructure. We have also commissioned all of the various reports necessary to support a planning application and will be bringing forward the application in 2021 to demonstrate commitment to delivery of the site.

The Estate are committed to delivering a high quality, beautiful development which will be in keeping with the surrounding landscape and local vernacular. There will be a requirement for natural open space within the development and it is envisaged that the current planted boundary to the site will need to be displaced and replaced with compensatory planting on the new site boundary.

It is proposed that the development will deliver a good mix of housing including fulfilling the policy requirement to build 20% of the overall housing numbers as affordable dwelling. The development will deliver a Community Infrastructure Levy (CIL) contribution of £59.64 per square metre of build and the development overall could generate an overall CIL receipt somewhere in the region of £900,000 to spend on local projects. The Estate are not seeking to reduce either of these contributions on viability grounds.

To conclude the Estate fully support the site allocation. Allocating the site in the final plan would solve the longstanding surface water flooding problems in the town, provide a new roundabout and deliver a high-quality sustainable development. This

BERRYS

is a once in a generation opportunity. We understand there is a willingness amongst all parties to see this scheme delivered to address the current local flood problem and were very pleased to see the Town Council supported the site allocation in their recent consultation response.

I trust you will take these representations into account in preparing the Final Plan, as it approaches its examination stage. If you have any queries whatsoever, please don't hesitate to contact me to discuss.

Yours sincerely,

Stuart Thomas BA(Hons) MA MRTPI
Head of Planning
For and on behalf of Berrys
DDI: 01743 267069
stuart.thomas@berrys.uk.com

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:	Stuart Thomas (BERRYS) on behalf of WENLOCK ESTATES
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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="S13.1"/>	Site:	<input type="text"/>	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:

- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" 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.

This policy is supported as it recognises the role of Much Wenlock as a service centre for a large rural hinterland and its location on a 'strategic corridor' (the A458). Paragraph 3.142(a) of the Plan identifies that the A458 is a Strategic Corridor and Policy SP14: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major employment development". Whilst criterion 4(a) of policy SP14 recognises that, in order to achieve a sustainable pattern of development, employment growth in these corridors will need to be balanced with an appropriate level of housing growth.

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(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.

(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)?

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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:

Office Use Only	Part A Reference:
	Part B Reference:

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(Please continue on a separate sheet if necessary)

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Signature:

S. Thomas

Date:

01/02/2021

Office Use Only	Part A Reference:
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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S13.1(i)"/>	Site:	<input type="text" value="MUW012VAR"/>	Policies Map:	<input type="text" value="S13"/>
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strategic importance of Much Wenlock but where the delivery of sufficient windfall development is problematic due to the unique character of the town and the numerous constraints to such development such as flooding and highway access.

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- Drainage and Flood Risk

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