

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:	Cllr David Turner
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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="Click or tap here to enter text."/>	Policy:	<input type="text" value="S20"/>	Site:	<input type="text" value="IRN001"/>	Policies Map:	<input type="text" value="IRN001"/>
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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 checked="" 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.

1. I recognise that this site needs to be developed in order to mitigate against the impacts that the power station has had on the land over many decades.
2. I do not believe that greenfield land adjacent to the brownfield site should be developed. It is unnecessary to sacrifice good agricultural land for development, especially when such development can be seen to have a negative impact on highways and the surrounding communities. I recognise that employment and economic growth will generally be advantageous but in this location the damage will be greater than the benefit. The Local Plan Review has sufficient headroom to discard the greenfield site.
3. Shropshire Council's Place Plan that includes Buildwas is that for Much Wenlock. Shropshire Council Commissioning Support Team provided population estimates in 2017 for the

Place Plan area based on 2015 Mid Year Estimates by LLSOA, Office for National Statistics. This was 3,980, comprised of that part of the Much Wenlock electoral division which falls within the place plan area, and the balance of 1,060 falling within that part of the Severn Valley electoral division which falls within the place plan area. It should be noted that a substantial minority of the Much Wenlock electoral division falls into the Broseley Place Plan Area.

This is important inasmuch as the Much Wenlock Place Plan states “The town is subject to inward development pressure and to avoid becoming a commuter-focussed settlement, the priority is for local employment opportunities, balanced with housing and infrastructure, to meet local needs.”

It can be readily seen that 1,000 new homes at Buildwas (IRN001), along with at least 200 in Much Wenlock (MUW012VAR, plus windfall) and 60 at Cressage (CES005), is likely to at least double the population in the Place Plan – and concentrated in the northern third of the Area. This will place a disproportionate burden on Much Wenlock town, being the Key Centre. It will also be anything but “balanced”.

4. The Local Plan Review proposal says: “Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).”

There is much concern about two important road junctions in Shropshire:

- the junction of the B4380 and the A4169 at the point that it crosses the River Severn adjacent to the site, and
- the junction of the A4169 and the A458 in Much Wenlock, commonly called ‘the Gaskell corner’. I shall use this description from hereon in.

5. Dealing first with concerns about the junction of the A4169 and the B4380 at the Buildwas bridge, The prospect of vehicles descending the hill at speed and approaching traffic lights (or a roundabout, for that matter) is alarming. Without traffic lights, vehicles can move away from approaching traffic without breaking the law. Stationary traffic will effectively be "sitting ducks" for vehicles of every description freewheeling down the by-pass. The evidence, in tyre marks on the carriageway to the west of the junction, can be seen of overrunning HGVs. The prospect of traffic control here needs serious reconsideration, and if safe provision cannot be made, the scheme should be dropped, or radically amended.

The A4169 is a road which, for the most part, is covered by a 50 mph speed limit which climbs over 100m from Buildwas to Much Wenlock along a winding route. The road is used by a variety of traffic, from bicycles, private cars, agricultural machinery to heavy goods vehicles. Some of the latter are quarry trucks hauling their burden locally, and some are articulated vehicles which are plainly avoiding using the A5 and A49 for long distance haulage. Between Buildwas and the 30mph zone in Much Wenlock there are five junctions with unclassified roads, all of which are narrow and which require drivers to have quick wits and rapid acceleration for egress onto the A4169. There have been a several "shunts" where a vehicle or vehicles have failed to stop when a preceding vehicle is turning. There are also several private driveways, the majority, of which present a challenge, in some cases requiring highways mirrors, to gain egress to the main road.

So, we have vehicles travelling at widely varying speeds, a dearth of good sight-lines, and a long and varying incline/decline, a situation that will be exacerbated by an increase in heavy traffic.

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Part A Reference:

Part B Reference:

6. Turning to Much Wenlock, this traffic has to pass William Brookes School. A minority of the students at this establishment actually live in Much Wenlock, which means that buses, coaches and private cars descend on the campus morning and afternoon creating significant congestion on a Much Wenlock scale.

The A4169 then passes through the narrow part of Sheinton Street, where traffic lights endeavour to ensure that large vehicles do not meet - the road is too narrow for two to pass each other. Further volume will result in a back up to the school entrance heading south and, heading north, towards the Gaskell Arms junction at the A458. It should be noted that articulated lorries delivering to Travis Perkins builders' supplies yard frequently wait for access by parking on the highway, rendering one lane closed.

When the River Severn floods in Ironbridge – an event that occurs usually more than once a year, the road through the town, The Wharfage, has to be closed. Traffic has to follow different routes which inevitably means some goes through the A4169 in Much Wenlock. If The Wharfage is closed this usually means that the B4380 between Eaton Constantine and Cressage is closed as due to the river overtopping. raised awareness of the result of more traffic passing through Much Wenlock. Recent experience shows that the traffic lights mentioned above were ineffective once large vehicles heading for the A458 were brought to a halt between them. The result was the situation they were intended to avoid - HGVs mounting the footway, reversing etc., and endangering pedestrians and roadside residents, the highways infrastructure and properties.

7. The stretch of the A4169 from the southern access to Station Road to the junction of Bridge Road is characterised by having footway on only one side of the road. This means that pedestrians are frequently, and necessarily, on the carriageway, their alternative being to cross and re-cross the road. Those properties fronting the road from Queen Street to the A458 junction sit behind a narrow footway. The evidence of mud and road grime on the front elevations indicates the impact traffic already has on the health and wellbeing of residents. An increase in traffic volume will create more noise, vibration and emissions. Stationary traffic will extend further along Smithfield Road, into New Road and maybe further.

At the junction of the A4169 and A458 there a number of conflicts which can be so readily observed I don't intend to describe them fully. Vehicles endeavouring to emerge from both the B4378 and the A4169, however, can hold up following traffic for substantial delays. While this may be measured as no more than a couple of minutes in many cases, this does mean that impatient drivers of vehicles rat-run through the narrow streets - especially Sheinton Street to reach the A458 toward Bridgnorth and along King Street to access the A458 in either direction. Steps need to be taken to ensure that this practice does not increase - it creates further congestion and significant danger when vehicles mount the footway in Sheinton Street. There is no footway in King Street - pedestrians have no choice but to walk on the carriageway. The government's pledge to reduce rat-running through residential streets is especially pertinent to this application.

8. Crucially, the Gaskell Arms junction is particularly hazardous for pedestrians. Crossing the A4169 with its junction with the A458 requires alertness and agility - and sometimes the goodwill and consideration of drivers merging onto the A458.

I have further concerns that access on to onward routes may be sought using the unclassified roads from Gleedon Hill, through Sheinton to Cressage, and down Homer bank through the village and on to the A458 at Wigwig. Most will only try the latter once, given

Office Use Only	Part A Reference:
	Part B Reference:

its narrowness at the A458 end and the ford - which can be impassable at time of heavy rain. And, in order to access Bridgnorth etc. some may choose to use the single track lane through Wyke, to Posenhall, and onward through Benthall and Broseley. There are few passing places on this lane, so some tricky manoeuvres are necessary.

The sum of these issues is that a careful study should be made of the likely impacts, and measures must be devised that ensure that the safety and health of those living along the onward routes is not adversely affected. The Much Wenlock Neighbourhood Plan states that "Heavy vehicles pass through the town on a daily basis in connection with quarrying operations and the use of former quarries for haulage and industry. In addition, bridge and road weight limits bring considerable volumes of heavy traffic through Much Wenlock on the A458 and A4169. Given its location at the heart of a network of important roads the Plan seeks to manage development arising in the parish to ensure that new development does not exacerbate existing problems." It is ironic that instead we are likely to see development just outside the parish boundary which may "have an unacceptable traffic impact on the wider town and the capacity and operation of its highway network."

There is already an increasing volume of articulated and other heavy vehicles using the A4169 and A458. It is plain that they are not delivering or loading in or near Much Wenlock. For all of these reasons, I hope that the local planning authority will ensure that road haul routes are on the A4169 northwards towards the M54 and trunk routes, and not through Much Wenlock.

I have mentioned cyclists. Those that are seen on the A4169 are mostly either club cyclists or tourists. The incidence of commuters is low. The suggestion in the application that students will cycle to Much Wenlock is a fantasy that is unlikely to be realised. The climb and descent is too steep and the presence of fast traffic and large vehicles would mean that parents will deter their offspring from attempting this on a regular basis. Similarly walking - although less than three miles from the subject site to William Brookes School, the absence of a suitable wide verge, or any verge at all, for substantial distances would render this a "hazardous route" by Shropshire Council standards.

9. The impact of this development will be felt many miles away. I have concerns about its scale and I have concerns about the effect on residents over a wide area during the extensive construction phases.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

A realistic approach to highways impacts

(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 wish to provide the inspector with the opportunity to ask questions of a democratically-elected community representative of Much Wenlock – the community that will arguably suffer the greatest detriment from traffic impacts

(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.

Signature

Date: 26/02/2021

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Cllr David Turner
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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="SCI"/>	Policy:	<input type="text"/>	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 checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" 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.

I am concerned as regards the consultation process thus far, and especially in the Regulation 19 stage, on the following grounds.

1. The complexity of consultation during the Partial Review the process is such that the layman is at a marked disadvantage to the professional planner in being able to consider the implications for the local community. As a community leader I have received numerous representations from well-educated and intelligent residents who despair of how they should respond to a consultation that appears to be designed entirely for the convenience of the Planning Authority to the disadvantage of unrepresented individuals.
2. Whilst I understand that this has been an iterative process, insufficient publicity has been afforded by the LPA to the ultimate proposal for Much Wenlock. I chaired a well-attended

(100-plus participants) public meeting, addressed by the Council's Planning Policy Manager in January 2019. Objections voiced at that meeting can be addressed elsewhere, but the proposal that has found its way to this consultation is for a growth guideline 33% higher than the original proposal, and seeks to allocate a single site that is 50% larger than the original proposal.

This has been reached on the basis of a two-hour walk-in event in Spring 2019 hosted by the promoter, with negligible prior publicity and with no opportunity to public questions in front of a wide audience such as was afforded in the January meeting.

3. The Covid restrictions have meant that the usual opportunity to view a paper copy of the consultation at local libraries has largely been lost. Whilst a three-week extension to the consultation period was granted, this was only in the dying days of the allocated seven weeks, meaning that the usual means of disseminating this information locally (parish magazines etc.) was frustrated. For those who have preference to view a paper copy (or who do not have access of the skills to view and respond online), publicity about what access was available was inevitably compromised by the reduced circulation of the hard-copy local press.
4. Turning to the online consultation documents, they are laid out and scaled in such a way that it is difficult to read the detail on one screen at once. Even if printed, they would be difficult to assimilate at size A4. There are few households have ready access to an A3 printer which might have provided a more comprehensible document. There was therefore a disincentive to interested parties to read the detail and no encouragement to those with a passing interest to take part in the consultation. I printed out page 12/86 of 'Sustainability Appraisal - Appendix N. Much Wenlock Place Plan Area Site Assessments' on an A4 printer and estimate that the font size equates to approximately 5pt or 6pt. This too small to read easily, especially in a document as large as this. The University of Edinburgh recommends it is best practice to type word documents in font size 14, and no smaller than font size 12, to assist readers with visual impairments.
5. Difficulty in comprehending the documents is compounded by the absence of repeater headers on the site assessment pages where sites ran across more than one.

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Better publicity
Consultation meeting for increased allocation to receive similar engagement to initial allocation
Longer consultation period, post-Covid lockdown
Simpler consultation documents
More easily-read documents

(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)?

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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 wish to provide the inspector with the opportunity to ask questions of a democratically-elected community representative

(Please continue on a separate sheet if necessary)

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Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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- 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:	Click or tap here to enter text.	Policy:	S13	Site:	MUW012VAR	Policies Map:	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: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(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.

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Much Wenlock

1. Shropshire Council's Place Plan that includes Buildwas is that for Much Wenlock. Shropshire Council Commissioning Support Team provided population estimates in 2017 for the Place Plan area based on 2015 Mid-Year Estimates by LLSOA, Office for National Statistics. This was 3,980, comprised of that part of the Much Wenlock electoral division which falls within the place plan area, and the balance of 1,060 falling within that part of the Severn Valley electoral division which falls within the place plan area. It should be noted that a substantial minority of the Much Wenlock electoral division falls into the Broseley Place Plan Area.

This is important inasmuch as the Much Wenlock Place Plan states "The town is subject to inward development pressure and to avoid becoming a commuter-focussed settlement, the

priority is for local employment opportunities, balanced with housing and infrastructure, to meet local needs.”

It can be readily seen that 1,000 new homes at Buildwas (IRN001), along with at least 200 in Much Wenlock (MUW012VAR, plus windfall) and 60 at Cressage (CES005), is likely to at least double the population in the Place Plan – and concentrated in the northern third of the Area. This will place a disproportionate burden on Much Wenlock town, being the Key Centre. It will also be anything but “balanced”.

2. There appears to be no guarantee that any detailed proposal will provide a range of house sizes and tenures, ensuring that it provides homes for all? (See Shropshire Council policies)

There is no certainty about the extent to which this new proposal will deliver housing for local needs and the extent to which it will provide affordable homes. Equally there is no apparent reference to such affordable homes being reserved for residents who can demonstrate a Much Wenlock local connection - and is thus out of step with the Much Wenlock Neighbourhood Plan.

The provision of public open space and recreation facilities, especially for younger people, does not appear to be guaranteed.

3. The economic benefit to the town’s traders, other businesses and workforce will be limited.

The proposed allocation is too far from the retail core to ensure that most shoppers travel by foot. As soon as residents are in a car, a choice of other centres with a more comprehensive range of shops are easily accessible e.g. Madeley, Bridgnorth, Telford, Shrewsbury.

4. The capacity of the town’s water supply, is demonstrably incapable of providing sufficient to satisfy existing demand at times. Without significant investment it will be insufficient if and when this proposal becomes the subject of a planning application.
5. Similarly, as regards the existing capacity of the town’s foul sewage network. I understand that there is no capacity for significant growth and, already, sewage is discharged into the Farley River, and thus the River Severn (under licence) when there is heavy rainfall.
6. The claimed flood attenuation measures associated with this allocation will not alleviate flooding throughout the town, not forgetting those vulnerable properties on the Farley River as it flows towards the Severn.

There appears to be no assurance that the proposed attenuation measures here will guarantee that homes built seventeen years ago in Hunters Gate will not flood

The Government recently set out a proposed investment of £5.2 billion to create flood defences to better protect 336,000 properties in England by 2027. In that context, when will this site be likely to be constructed? If it can provide flood alleviation as claimed, will it be built within the next five years? If not, will it be used as a reason for the Environment Agency to not invest in flood alleviation measures in our town? And what is likely to happen if the development does not take place until late in the plan period?

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Part A Reference:

Part B Reference:

7. Looking a couple of miles down the road, the impact of future development nearby, including Buildwas where there is an outline planning application for 1,000 houses, and Cressage where there is a preferred site for 60 houses, will pile further pressure on the town's fragile infrastructure. As regards highways:
 - a. In July, Highways England commented on the Buildwas application, saying that it cannot support the applicant's transport plan as it connects to the Strategic Road Network
 - b. The impact of the Buildwas development, together with this allocation will generate more cars on the junction of the A458 and the A4169. This will have a significant effect on traffic wait times as admitted by the Buildwas applicant's own transport assessment and, by the admission of Shropshire Council's Developing Highways Manager, the mitigation measures suggested by the applicant are wholly inadequate. This development and other draft allocations nearby including MUW012VAR will detrimentally affect pedestrians, cyclists, and commuters - especially those heading towards Telford and the West Midlands conurbation from the B4371 and B4378.
 - c. The proposed roundabout on Bridgnorth Road will not reduce the volume of traffic at the Gaskell Arms junction. It will generate increased noise levels, create more emissions and presumably will also have to be lit, thus adding an unwelcome feature to the night sky at a high point on the edge of the town. Of course, a roundabout in this location has not featured in the Much Wenlock Place Plan as an infrastructure requirement. Much Wenlock Town Council plainly does not see traffic calming as a necessity, since its significant investments in the past couple of years have included no expenditure in any measures to reduce traffic speed in the way that other local councils in Shropshire have done. And opportunities to lobby the Police & Crime Commissioner, who has funds available for this purpose, have been ignored. As the Shropshire Councillor for the area, I have received no representations from the Town Council to support any initiative they were considering in lobbying on this issue.
8. The capacity of the medical facilities in Wenlock and Cressage will have to accommodate the developments in both Cressage and in Much Wenlock. Many will testify to the length of time it takes to get an appointment (pre-Covid) with any doctor unless it is classed as urgent. Whilst the Buildwas development awaits the construction of medical facilities, doubtless the Much Wenlock surgery will see an increase in patient numbers.
9. Whilst Shropshire Council has advised that William Brookes School can accommodate, over time and with the construction of additional classrooms, more students from Buildwas, no account has thus far been given to the impact of the Cressage and this Wenlock allocation. The new Buildwas primary school is not likely to open before 2026.
10. The preferred site is not in alignment with the policies and aspirations of the Much Wenlock Neighbourhood Plan. Moreover, the continued trajectory of infill development in Much Wenlock has been acknowledged by Shropshire Council to be fulfilling the aspirations set out in the Neighbourhood Plan. There is a strong likelihood of two significant brownfield sites (MUW001 and MUW002) within the existing development boundary coming forward during the plan period providing a further 28 dwellings. There is an under

Office Use Only	Part A Reference:
	Part B Reference:

provision of small market dwellings for those in the twilight of their years to downsize into. Considerably more than 28 dwellings would be forthcoming if smaller units, possibly on two or three levels, are built on these sites - both convenient for all the towns amenities.

11. On this basis, and on the basis of the unwelcome allocation at MUW012VAR, it is likely that the housing growth will achieve 300 units, not the 200 stated in the draft review.
12. Much Wenlock has a neighbourhood development plan which is delivering on the aspirations garnered from widespread consultation. The draft Local Plan Review proposals are not acceptable in this small town and I object to them on the grounds set out above
13. The current trajectory of windfall sites, plus MUW001 and MUW002 will be perfectly adequate to achieve not only the original growth guideline of 150 dwellings over the plan period, but also the revised figure of 200, imposed without direct consultation.

(Please continue on a separate sheet if necessary)

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Removal of MUW012VAR and insertion of MUW001 and MUW002

(Please continue on a separate sheet if necessary)

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	Part B Reference:

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 wish to provide the inspector with the opportunity to ask questions of a democratically-elected community representative. Neither Shropshire Council nor Much Wenlock Town Council have adequately reflected the views of the overwhelming majority of those residents who have expressed an opinion from 3rd January 2019 onwards.

(Please continue on a separate sheet if necessary)

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