

## 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:	Mrs Susan O'Dowd
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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="S.13"/>	Policy:	<input type="text" value="S.13"/>	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 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.

Shropshire Council claim they can set Sites and development numbers for Much Wenlock because the Much Wenlock Neighbourhood Plan only lasts until 2026 but the Local Plan Review is up to 2038. The Town Council have said that they do not currently need to update the Neighbourhood Plan. If the MWNP does not currently need updating why have Shropshire Council decided to impose development and a single site option totally out of step with the provisions of the current Neighbourhood Plan. As evidenced by the detailed submission made by the Much Wenlock Neighbourhood Plan Refresh Group there are suitably qualified and experienced local residents ready and willing to find the evidence required to update it.

Further Shropshire Council are willing to accept that the proposed Broseley Neighbourhood Plan S.3 should find appropriate as yet unidentified Sites for a Neighbourhood Plan which has as yet to be legally finalised. In the Introduction to this draft (page 10) paras: 2.29 and 2.30 Shropshire Council claims it has a positive and proactive approach to Neighbourhood Plans. If so why did it fail to have the MWNP and the Shifnal Neighbourhood Plan updated instead of Shropshire Council taking control and putting in its own options to cover the extra 12 years.

(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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Either Much Wenlock's Neighbourhood Plan does not need updating, then the County sets the development target and the terms of the Neighbourhood Plan are used to identify suitable Sites, or to keep it relevant the Neighbourhood Plan needs updating in parallel with this Local Plan Review. Shropshire Council can not have it both ways.

*(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:**

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

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Signature:

Date: 22nd February 2021

Part A Reference:

Part B Reference:

Shropshire Council:  
Shropshire Local Plan



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**Part B: Representation**

Name and Organisation:	Susan O'Dowd
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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="S.20"/>	Site:	<input type="text" value="S.20"/>	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"/>            |
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The former Ironbridge Power Station has been designated a Strategic Settlement in the Much Wenlock Place Plan Area (S.13). S.20 is a proposed development of more than 1000 homes on the A4169 at Buildwas. There is no mention of what would be the impact of this development on Much Wenlock and the rest of the Place Plan area. The A4169 meets the A458 at the Gaskell Junction in Much Wenlock. Congestion already causes queues and rat-running through the narrow medieval streets of a town whose economy is heavily dependent on tourism.

Although the impact on traffic is the most obvious effect to be considered the development will also have a considerable impact on a variety of local services in Much Wenlock such as the workload of the medical centre and secondary school places where capacity is already limited. The absence of any consideration of these effects on Much Wenlock must be regarded as a serious defect in the soundness of the draft plan.

There are even plans under discussion to make the A458 part of a western development corridor.

(Please continue on a separate sheet if necessary)

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The policy for the development of the former Ironbridge Power Station Site for 1000 plus homes needs to take into account what the impact will be on the rest of the Much Wenlock Place Plan Area in particular the A458/A4169 junction.

(Current suggested plans for the junction by the developer that only accounted for three roads have been demonstrated by a professional with a life time experience in major traffic management to fail. Advice is also that a suitable alternative is unlikely to be found for this five way junction)

Should the County Council be asked to consider whether a bypass is a suitable alternative.

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

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[Empty box for response to Q7]

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Signature: [ ]

[ ]

Date: 23/02/2021

ie Only	Part A Reference:
	Part B Reference:

Shropshire Council:  
Shropshire Local Plan



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**Part B: Representation**

Name and Organisation:	Susan O'Dowd
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**Q1. To which document does this representation relate?**

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

Paragraph:	<input type="text"/>	Policy:	Appendix N	Site:	Appendix N	Policies Map:	<input type="text"/>
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Sustainability Appraisal - Appendix N. Much Wenlock Place Plan Area Site Assessments

The information in the appraisal is so inaccurate as to make it unsound e.g.

Site MuW008 (page 23) This describes the site as having Planning Permission for an attenuation pond after which its suitability may be reassessed. The attenuation pond is one of two costing well over a million pounds. They were built before the LPR process was started.

Site MuW012VAR the preferred Site (page 62) The inaccurate assessment includes amongst other inaccuracies 'The percentage of the site within 20m of an historic flood event 0%'. There are a number of photographs showing part of the Site itself flooded including in 2020 and 2021. Much Wenlock is situated in a Rapid Response Flood Catchment Area. Shropshire Council has a duty to assess sites taking into account the risk of flooding. They have chosen the most flood prone site in the town. Arbitrarily expanded it, no consultation but a very unconvincing presentation from drainage specialists. Why? When there are other sites closer to the town and facilities, more in line with the provisions of the MW Neighbourhood Plan.

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Re-assess the possible Sites in Much Wenlock accurately. Use the provisions of the Much Wenlock Neighbourhood Plan, preferably as part of updating it to evaluate them and identify suitable Sites to meet the development target.  
(This may need reducing to the original proposal as it was raised after MuW012VAR was imposed because the potential developer realised the large scale flood attenuation required could potentially cost millions. MuW012VAR does not benefit from either of the two existing attenuation ponds)

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Signature:

[Signature box]

Date: 23/02/2021

Office Use Only	Part A Reference:
	Part B Reference: