



## Representation Form

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### Part B: Representation

Name and Organisation:	John O'Dowd MUCH WENLOCK CIVIC SOCIETY
------------------------	---

#### 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:	S.13	Policy:	S.13	Site:		Policies Map:	
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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"/>            |
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The LPR totally ignores the provisions of the current Much Wenlock Neighbourhood Plan. The single commercially driven site is completely out of scale (MuW012VAR). The attempted justification is that the County Council can impose this because the Neighbourhood Plan only runs to 2026. The submission made by the Much Wenlock Neighbourhood Plan Refresh Group to this and the Draft Regulation 18 of the LPR shows that there are highly qualified people in Much Wenlock perfectly prepared to update the Neighbourhood Plan to 2038.

A further inconsistency is that other Neighbourhood Plans e.g. Broseley (S.4), which have yet to be officially made are incorporated. Even though they have as yet to identify their Sites.

The Council has legal duties to look at the risk of flooding and chose sites least likely to flood, especially as Much Wenlock is officially a Rapid Response Flood Catchment Area. The Site MuW012 VAR has flooded twice this year. Unlike any other Site assessed. Comment on the choice of Site has been put under the 'Sustainability Appraisal of the Regulation 19: Pre-submission Draft of the LPR' as required.

(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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Comply with Government legislation and Planning Policies. Comply with the policies of the Much Wenlock Neighbourhood Plan updating it as necessary. Re-evaluate all the Sites using accurate information - see submission under Sustainability Appraisal.

The Much Wenlock Civic Society does not disagree with the right of the County Council to set the number of homes to be built in Much Wenlock to 2038 but any change in the annual rate of completions should be subject to extensive consultations with the local community. It believes that the present target can be met observing the policies of the Neighbourhood Plan. It merely asks that the County Council does not ignore the status and policies of the Neighbourhood Plan without justification and explanation. In doing so up until now it has ignored the requirements of Acts of Parliament, national policy and guidance and the written views of Government Ministers.

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Yes, I wish to participate in hearing session(s)

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Signature:

Date:

22nd February 2021

Part A Reference:

Part B Reference:

Office Use Only

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Name and Organisation:	John O'Dowd MUCH WENLOCK CIVIC SOCIETY
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Shropshire Council's Statement of Community Involvement says that there should be meaningful opportunities for the public to engage in looking at the possible options for development in the town and help shape the policy. Council officers have declined invitations to community meetings and ignored the community views that have been submitted.

More particularly the original preferred Site MuW012 was reached with no other option being put to the town. Despite objection to the former it then arbitrarily morphed into the much larger MuW012VAR to suit the claimed needs of the landowner and developer. Shropshire Council has said that any dissenting views can be aired at the Examination in Public.

The Site Assessments for Much Wenlock (See separate response to the Sustainability Appraisal) are flawed. It has ignored the sequential test that Councils should choose sites that are not at risk from flooding. It has chosen one that requires serious flood attenuation. It has said that a scheme to attenuate surface water flooding will be required apparently ignoring the probably more serious threat from ground water. There is an artesian well and springs in the field to the East of the MuW012 VAR site.

The Council has not considered the strategic impact on the medieval streets and congested main road junction A458/A4169 of this and other major local developments or the general flood management in the town

(Please continue on a separate sheet if necessary)

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Comply with Government legislation and Planning Policies. The potential development sites in the town should be accurately reassessed particularly in relation to the provisions of the Much Wenlock Neighbourhood Plan and in respect of Much Wenlock being situated in a Rapid Response Flood Catchment Area. Shropshire Council should say how it is going to deliver the necessary infrastructure to support a 15% growth in the town. The related issues of the impact on the town of building 1000 plus homes at Buildwas in which is also in the Much Wenlock Place Plan Area as well as a similarly sized development in Bridgnorth should be taken into account.

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

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Part A Reference:

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Part B Reference:

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The large scale of overall housing development proposed without clear indications of how this is justified.

The Government's assessment of Local Housing Need (paras.3.5, 3.6 and 3.7) is 25,894 homes from 2020 to 2034. Shropshire Council has agreed to co-operate with the Black Country to pick up 1500 homes from their requirement subtotal 26,394 and then says but we might need a few more and makes the total 30,800 homes. There is no clear indication about how they reached this final figure. No indication of how they are going to provide the necessary infrastructure.

A popular commuter route to the Black Country from Shrewsbury and vice versa is using the A458 through Much Wenlock (S.13) and then through Bridgnorth. This is in addition to a failure to say how they are going to mitigate the effect on Much Wenlock of Building 1000 houses at Buildwas on the A4169 in the Much Wenlock Place Plan Area. The two roads meet at an already heavily used junction at the Gaskell Arms which leads to rat-running through the towns medieval streets.

(Please continue on a separate sheet if necessary)

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Comply with Government legislation and Planning Policies. Give a detailed explanation of how they reached a total of 30,800 homes. What are the commitments/proposals for local employment opportunities? How will they solve the problems caused by the increase in traffic? Particularly through the A4169-A548 junction in Much Wenlock.

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Date:

February 22<sup>nd</sup> 2021

Part A Reference:

Part B Reference:



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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.

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Comply with Government legislation and Planning Policies. 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.

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22 February 2021

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Part B Reference:





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Sustainability Appraisal - Appendix N. Much Wenlock Place Plan Area Site Assessments

The Much Wenlock Civic Society questions the soundness of the Site Assessments and the conclusions drawn from them. For instance 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 and which was 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 photographs over time including 2020 and 2021 showing part of the Site itself flooded.

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Comply with Government legislation and Planning Policies. Re-assess the possible Sites in Much Wenlock accurately. Use the provisions of the Much Wenlock Neighbourhood Plan, preferably suitably updated to evaluate them and identify suitable Sites.

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