

Representor unique Part A Ref *	A0418
Matter	1
Relevant questions nos	1b, 16

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

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Plan preparation

1. Is the Local Plan compliant with:

(b) the Statement of Community Involvement?

General/Overarching Comments:

3. Concerns about legibility of the draft Shropshire Local Plan.

Shropshire Council response: None

My submission:

The NPPF states that the planning system should be easier to understand, more accessible and with a commitment to involving all who are interested in planning.

The Council appears to have paid no regard to my issue with the layout and scale of the online consultation documents. These are difficult to read in detail on one screen at once. Even if printed, they would be difficult to assimilate at size A4. There are few households that 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 details 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 I estimate that the font size equates to approximately 5pt or 6pt. This is 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.

Difficulty in comprehending the documents is compounded by the absence of repeater headers in the site assessments where site descriptions run across more than one page.

The Regulation 19 consultation was conducted partially through the prevailing Covid restrictions. This meant that the usual opportunity to view a paper copy of the consultation (on request) at local libraries had 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. This, in turn, meant that the usual means of disseminating this information locally (parish magazines etc.) was frustrated. For those who have a preference to view a paper copy (or who do not have access or 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.

7. Consultation undertaken to inform the draft Shropshire Local Plan does not comply with the Statement of Community Involvement and/or legislation/legal requirements (Gunning Principles often referenced).

Shropshire Council response: strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.

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My submission:

I understand that this has been hailed by Shropshire Council as an iterative process. In the context of the proposals for Much Wenlock however, insufficient notice and publicity was afforded by the Council to the ultimate proposal for Much Wenlock including the increase in the growth guideline. As the then Shropshire Councillor for Much Wenlock, I chaired a well-attended (100-plus participants) public meeting, addressed by the Council's Planning Policy Manager in January 2019. This was based on a 200-dwelling guideline for the town of Much Wenlock, with a site allocation for 80 units. The proposal that found its way into the Regulation 19 consultation was for a growth guideline 33% higher than the original proposal, seeking to allocate a single site that is 50% larger than the original proposal.

So I contrast a well-publicised public meeting about a preferred site for 80 dwellings as part of Shropshire Council's ten-week Regulation 18 consultation against a two-hour walk-in session organised by those promoting the site (with Shropshire Council's endorsement) for 120 dwellings. I was advised by the Council about this significant change at the end of January 2020 and the walk-in session was held in Much Wenlock on 26th February 2020 - far too little notice to advertise the event effectively. It is worth noting that at this session there was no facility for members of the public to record their response to the new proposals.

The complexity of consultation during the Partial Review process was 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 despaired of how they should respond to a consultation that appears to be designed entirely for the convenience of the Planning Authority and to the disadvantage of unrepresented individuals. Some hoped to defer to the Town Council, but found it unwilling to engage with residents.

Finally, I and other Shropshire Members met as a group online with the then Council Leader and the then Portfolio Holder for Housing and Strategic Planning (and, I think I recall, on at least one occasion with the Council's Planning Policy and Strategy Manager). These meetings took place on several occasions. The topics were the steps taken in identifying site preference and consultation thereupon for Bridgnorth, Much Wenlock, Shifnal and Whitchurch. Whilst undertakings were given to Local Members to go away and consult with officers, what little feedback resulted gave the very clear impression that no more than lip service was being served.

Taken together, I believe that this demonstrates this process has **not** met the requirements of the Statement of Community Involvement.

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Neighbourhood plans

16. Does the Local Plan set an appropriate framework, and allow a suitable role, for existing and future neighbourhood plans in the plan area?

My submission:

No. Whilst recognising that the neighbourhood plans for Shifnal and Much Wenlock are for a period ending twelve years before the end date of the Local Plan, in the case of the latter it has been recognised by Shropshire Council that growth is in line with the envisaged trajectory. Joint monitoring, until it was stopped by the previous (pre-2021) Town Council, was agreed as being in line, and even a little ahead of, the housing growth plan. Housing completions to the current date continue to confirm this¹. There are at least two substantial (in terms of the size of the town) sites within the development boundary which, if offered for planning permission, would with the preferred site MUW012VAR and continued infill, take housing numbers to c. 300. 50% greater than the unconsulted growth figure of 200.

Actions speak louder than words. There is little apparent encouragement for communities to create a neighbourhood plan in Shropshire. Eleven years after the Localism Act, only four neighbourhood development plans have been 'made' by Shropshire Council. The inspector of the Broseley NP has indicated that, subject to changes, it should go forward to referendum. A further nine designated areas have been approved. Compare the number in Shropshire against those in comparable and/or local LPAs:

LPA	Made/ adopted
Shropshire	4
Stafford	6
Telford	7
Malvern Hills	8
Wychavon	10
Northumberland	19
Cheshire West and Chester	24
Cheshire East	37
Wiltshire	46
Cornwall	54
Herefordshire	83

Source: PlanningResource May 2022

¹ A planning appeal Ref: APP/L3245/W/21/3281756 regarding land adjoining The Old Vicarage, Bourton Road, Much Wenlock TF13 6AH against the refusal decision (20/04580/FUL) of Shropshire Council. The development proposed is erection of 2 no. 3-bedroom dwellings following demolition of existing buildings.

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At para 26 the Inspector reports that *“the Council expresses confidence that delivery of housing to address the [short-term] shortfall is achievable without delivery of the appeal site. Evidence in respect of actual housing delivery rates in Much Wenlock during recent years, as well as recent planning permissions, indicate that a suitable rate of delivery would be achievable.”*

1,253 words