

Dear Ms Trueman

Shropshire Council Local Plan Matter 2 – Duty to Cooperate (DtC).

As I represented the entire group on Matter 2 at the initial hearing, I have been deputed to write to you on behalf of those listed below from Much Wenlock, now invited to participate in the resumed Examination of Matter 2 in the Shropshire Council Local Plan.

A0088 MW Refresh Group, A0469 MW Civic Society, A0231 Howard Horsley, A0307 Alan Edwards, A0416 Clive Morley, A0499 Jim Orves, A0471 Sue O'Dowd.

We first wish to thank you for granting us the opportunity to participate in the additional hearing in January 2023. We note the indications that this additional session will primarily focus on the number of new homes required to accommodate 'overspill' from the Black Country. As we have indicated elsewhere, we share concerns that accommodating these needs may be influencing what we consider to be an excessive number of new homes required across the county.

We are, however, mindful that our participation in the session may not help in determining the major issues on soundness which the Inspectorate needs to consider. We therefore share the willingness of the Much Wenlock Town Council to forego any right to be heard in person on these major issues at this hearing.

In our earlier written and oral submissions on Matter 2 we made plain our serious concern about the effectiveness of compliance with the Duty to Co-operate. We also drew attention to the very late availability of Statements of Common Ground. This made critical evaluation of their validity particularly challenging. Since the initial hearing further new evidence has become available on several of the relevant issues. This has only added to our concern that the quality and objectivity of the Local Plan may have been seriously impaired by a lack of capacity within the team tasked with its production. We wish, therefore, to emphasise in writing our continued concern on the issues which relate directly to the 'Duty to Co-operate.' These are detailed in the accompanying document.

We also reserve the right to produce further evidence on these and other issues when Part 2 of the Examination in Public is scheduled.

Thank you for keeping us informed of developments.

Yours sincerely,

Howard Horsley on behalf of all those listed above.

Issues of continued concern of Representatives from Much Wenlock under Matter 2.

(Those who share concerns on Matter 2 include the Much Wenlock Civic Society, the Much Wenlock Refresh Group and individual residents listed above who responded to this consultation.)

Concerns

1. That local knowledge is not sufficiently embedded in the Statement of Common Ground between Shropshire Council and Severn Trent Water. This statement lacks the rigorous evaluation of actions required to address well documented issues of local flooding and of failures in water supply.
2. That the lack of reference to a 'Rapid Response Catchment' in co-operation between Shropshire Council and the Environment Agency constitutes a clearly demonstrable failure in the 'Duty to Co-operate'. The Environment Agency was not reminded by Shropshire Council of its obligation to consult the local community in the context of the National Flood Risk Strategy. There has, moreover, been no re-evaluation of obligations in respect of site allocations in the light of numerous public consultation responses drawing attention to well documented flood risks of a Rapid Response Catchment.
3. That the Local Plan is inconsistent in responding to the 'Duty to Co-operate' in respect of growth plans. Policy SP2 sets out the strategic approach including the Economic Growth Strategy for Shropshire, specifying (3.28) strategic growth corridors. SP2 makes no reference to the A4169 but this route is later identified in Policy SP14 (3.142). Such inconsistencies undermine the case for site allocations exceeding local need in locations such as Much Wenlock.
4. That no proposals for the concept of and case for a "Strategic Growth Corridor" passing through Much Wenlock and extending to the West Midlands Conurbation were publicised before the Local Plan was published. The validity and viability of these proposals were never subject to critical prior examination or full public consultation. They are now further undermined by the apparent collapse of the Association of Black Country Authorities from which this outcome of the 'Duty to Co-operate' is presumed to have derived.
5. That the 'Duty to Co-operate' is inextricably linked to the aim of sustainability, particularly so in responding to the Climate Emergency. No evidence in the plan justifies a community development strategy which is unsustainable, being bound to increase commuting, as we believe would be the case if the current site allocation were to be imposed upon Much Wenlock.