

CABINET 20/07/20
Public Questions

Question 1 from:	Mrs Lesley Durbin
Subject:	Shropshire Local Plan Review – Pre Submission Consultation
Portfolio Holder:	Robert Macey
Director:	Mark Barrow

QUESTION

You are aware that Much Wenlock has a Neighbourhood Plan adopted by SC in 2014 which continues as a statutory document until 2026.

You are all well aware of the Government Guidance on Neighbourhood Planning which advises ‘material modifications which change the nature of the plan or order would require *examination and a referendum*.’ This might be, for example, allocating significant new sites for development or changes to the development boundary.

- 1. Why have Shropshire Council not undertaken a consultation, examination and referendum as advised by Govt to determine if the community of Much Wenlock are in support of the development MUW012 and are willing to have the important under- pinning policies of their Neighbourhood Plan changed ?**

Shropshire Council has relied on Much Wenlock Town Council as their consultation contact but has not encouraged, advised or supported the Town Council to engage in meaningful community consultation

Shropshire Council conducted an on line consultation regarding MUW012 throughout November 2018– February 2019 ATKINS -SNC Lavalin Group (analysis consultants) clearly had no understanding of the significance of place of either community, their analysis presented an inaccurate portrait of both .

- 2. Why were Much Wenlock and Cressage, two entirely separate communities, each with their own concerns merged into one survey document which resulted in skewed analysis of the Much Wenlock community response to MUW012 which did not resonate with other independent community consultations?**
- 3. Does the Cabinet agree that in not supporting and encouraging the Much Wenlock Town Council to properly engage with the community there has been no meaningful dialogue with the community, a stated requirement in your SCI ?**

1.8 The Statement of Community Involvement reflects the Localism agenda covered by the [NP]Act, in particular ensuring early and meaningful engagement with local communities in the decision making process.,

RESPONSE

1. It is the responsibility of the Shropshire Local Plan to plan appropriately for the period to 2038, which is 12 years beyond the end of the current Plan period for the Much Wenlock Neighbourhood Plan. Once adopted, the Shropshire Local Plan will form part of the Development Plan for the area, alongside other adopted, or ‘made’ Neighbourhood Plans, including the Much Wenlock Neighbourhood Plan.

Where there is a conflict between the two plans, the most recently adopted Plan takes precedence. However, in this instance the Shropshire Local Plan has sought to both

acknowledge and reflect the principles of the Much Wenlock Neighbourhood Plan within the proposed strategy for the town captured in Policy S13.1 of the Pre-Submission Draft Local Plan, which specifically states “the policies and proposals within the Neighbourhood Plan which conform to the Local Plan continue to apply”.

The proposals for Much Wenlock will be subject to independent examination by the Planning Inspectorate in the same manner as the rest of the Shropshire Local Plan.

2. For the purposes of presentation, the Local Plan process has used Place Plan areas to capture a range of settlement strategies. Place Plan areas seek to reflect functional linkages between areas, usually between a main town and its rural hinterland, but the individual strategies for specific settlements reflect the characteristics of these areas in establishing sustainable growth proposals.
3. Shropshire Council has and continues to work closely with town and parish councils in seeking to support meaningful local engagement with communities on the Local Plan, and this is a key feature of the Statement of Community Involvement (SCI). We will be providing further guidance notes to parish and town councils as part of the consultation on the Pre-Submission Draft Local Plan. Cabinet therefore does not agree that it has failed to support Much Wenlock Town Council in seeking to support local engagement.

Question 2 from:	Mr & Mrs Brian Jackson
Subject:	Local Plan
Portfolio Holder:	Robert Macey
Director:	Mark Barrow
QUESTION	
Why is a site in Much Wenlock, a town that is at an equal flood risk to Boscastle, even being considered for a major housing development on a field that floods frequently causing damage to homes and properties?	
RESPONSE	
<p>Answer to cover questions from: Mr & Mrs Brian Jackson Helen Hill; Mr and Mrs Harris; Mr Roland Brean; Mr Richard Bifield; John O’Dowd</p> <p>It is the role of the Local Plan to plan positively for settlements over the long term. This includes providing suitable opportunities for settlements to grow in a sustainable manner, whilst also seeking opportunities presented by new development to contribute positively towards the specific needs of places. The strategy for Much Wenlock, captured in Policy S13 of the Draft Local Plan, seeks to do this by allocated land to enable the town to grow at a moderate and appropriate pace over the next 18 years, whilst also seeking to reduce existing levels of flood risk both on and off site. Whilst the Local</p>	

Plan provides the principle for development on sites, and has been informed by proportionate evidence, it is for the subsequent Planning application process to ensure the proposed development on the site meets the development guidelines, including the delivery of substantial community benefits by way of flood alleviation.

The Draft Local Plan has been informed by a range of evidence, including a two stage Strategic Flood Risk Assessment and a Water Cycle Study. These provide information on the likely flood risk of potential site allocations from all sources of flooding, and the implications of development on water supply, wastewater collection and treatment and water quality. This evidence will be available to view through the consultation process on the Draft Local Plan.

The decision made by the English Severn and Wye Coastal Committee in January is separate to the Local Plan making process, and has not been influenced by it. It should also be noted that the type of flood mitigation being proposed through this mechanism, known as Property Flood Resilience (PFR), is focussed on the installation of products on the flood affected properties themselves rather than dealing with the root cause of the flooding. The developer led solution which would be sought through the delivery of the proposed allocation of land at Hunters Gate (MUW012/VAR) would seek to bring properties out of flood risk, rather than adapting them to deal with the challenges of continuing flood risk.

Question 3 from:	Ms Helen Hill
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
Why was a decision made on 21st January 2020 by the English Severn and Wye Coastal Committee to reallocate the money which was ring fenced to provide flood relief to Hunters Gate to other areas in the county, claiming a developer led solution will be sought? This site has been considered unsuitable for development and dismissed by Government at least twice in the past, for reasons which still apply, leaving Hunters Gate residents and other homes in the town unprotected from flooding.	
RESPONSE	
See above response to Mr and Mrs Brian Jackson	

Question 4 from:	Mr & Mrs Harris
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow

QUESTION

Why are Hunters Gate residents – who pay the same Council Taxes as other residents of the town - being told they can only have flood defences if additional homes are built, whilst £2.1m flood defences were built on Stretton Road and the Sytche without the need for additional houses?

RESPONSE

See above response to Mr and Mrs Brian Jackson

Question 5 from:	Mr Roland Brean
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow

QUESTION

Why, in view of the flooding history of the site, should residents have **any** confidence that the proposed development will not add to the problems of the site, or that the necessary remedial works will be rigorously undertaken by any developer?

RESPONSE

See above response to Mr and Mrs Brian Jackson

Question 6 from:	Mr Richard Bifield
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow

QUESTION

Much Wenlock is at the highest point in a water mains loop which includes Broseley and all of Telford. When the pressure drops for any reason, Much Wenlock and Homer are the first places at risk of losing supply. On several occasions in recent years water has had to be tankered in to supplement the town's water supply, and we have needed huge truckloads of bottled water to be distributed to the population causing noise and disruption to residents. The increased rate of building in Telford and the proposed developments at Ironbridge, Cressage and Bridgnorth will only exacerbate this. Given this critical part of the town's infrastructure is not secure, and while existing homes cannot be adequately supplied with water at times, why is Much Wenlock deemed to be a sensible place to build a large housing development?

RESPONSE

See above response to Mr and Mrs Brian Jackson

Question 7 from:	Mrs Shelagh Allen
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
Why is this scheme considering allowing ingress and egress to the site through the existing Hunters Gate development (mentioned in Berrys' plans in tiny print but denied verbally by their representatives) routing traffic onto the already congested, narrow Barrow Street, making it a potential rat run and yet more hazardous to both drivers and pedestrians and cyclists?	
RESPONSE	
Policy S13.1 (i) of the Draft Local Plan proposes that a new roundabout will be provided from the A458 to provide adequate vehicular access. This access point will be funded by the developer. Should any subsequent planning application propose a secondary or alternative point of access into the site this will need to be fully justified through the development management process.	

Question 8 from:	Mary Phillips
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
As you are well aware, there is no obvious way of improving the flow of traffic at the Gaskell Corner. Have you considered the additional pressures that will be put on that already notorious bottleneck not just from 120 extra homes here – whose residents will be using that junction to get to work - but also from developments in Tasley, Cressage and Buildwas? What measures will you be putting in place to mitigate the already unacceptable level of pollution and congestion at the Gaskell Corner?	
RESPONSE	
The impact of development proposals on the local and strategic highway networks have been considered by the Council in proposing land for allocation in line with the requirement of national guidance. This also includes the potential of sites to deliver opportunities for sustainable forms of transport. This information is contained in the Site Assessment process which has informed the preparation of the Draft Local Plan, and which will be made available at the consultation. A site allocation in the Local Plan seeks to establish the principle of development on the site. However, as is the case with all the proposed site allocations, further detail will be provided by the applicant through the development management process, and therefore a planning application would be required to demonstrate that any impact on highway safety or the residual cumulative impacts on the road network would not be severe.	

Question 9 from:	Maureen Williams
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
Despite works recently at the sewage station to make the processing greener it is at capacity and could not cope with additional homes. How will Severn Trent fund and address this if more homes are built?	
RESPONSE	
The impacts of development on water supply, wastewater collection and treatment and water quality have considered as part of the Council's Water Cycle Study, which has informed the preparation of the Draft Local Plan. This has been undertaken in consultation with Severn Trent Water, and forms part of the evidence base for the Local Plan and will be available to view through the consultation. Where it has been identified that there is a requirement to upgrade an existing provision this will be funded by Severn Trent Water as part of their capital programme.	

Question 10 from:	Mrs June Oates
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
The primary school currently has demountables for classrooms and is at capacity. What plans are in place to deal with the additional children from this development?	
RESPONSE	
The impact of proposed development on future education provision in settlements has been considered in discussions with the Council's Education services. Where necessary developer contributions from development will be used to either support extensions to existing education provision or support the funding of new provision.	

Question 11 from:	Graham Lewis
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
Please place on record and detail the grounds and evidence for claiming "exceptional circumstances" as a justification for including "major development" within The Shropshire Hills AONB at site CST021 in the Shropshire Local Plan Pre Submission Draft document	
RESPONSE	

The exceptional circumstances for major development in the Shropshire Hills Area Of Outstanding Natural Beauty (AONB) will be made available as part of the evidence base material as part of the consultation into the draft Local Plan.

Question 12 from:	Ron Parnell
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
<p>I believe that during the initial, informal, stage of the consultation process held between 29th November 2018 - 31st January 2019, 272 written objections were made to the planning department regarding the proposals to allow development on the Snatchfield site CST021. However, only 62 responses appear to have been taken into account for the statistical analysis. Could I ask what people will need to do in order to ensure that their views are properly accounted for and fully taken into consideration now that the process is being formalised?</p> <p>If you could confirm receipt of this email - and that the question has been proposed correctly - I would be most grateful.</p>	
RESPONSE	
<p>We acknowledge that there was significant objection to the allocation of CST021 (Snatchfields) at the Preferred Options stage of consultation. Whilst the scale of response, including levels of objection, are of course considered, it is the material issues raised which are of greater value to the Local Plan process. To this end, the Council considers that whilst there were errors in how some objections were categorised in the Consultation Summary Report, each comment has had due consideration, including all responses relating to site CST021 in Church Stretton.</p>	

Question 13 from:	John O'Dowd
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
<p>Can the Council could consider making any approval of MUW012 for development dependent upon a report from a Hydro-Geologist not recommending against development.</p> <p>I write as a concerned resident of Much Wenlock regarding 2 matters, which please include at the above meeting.</p>	

Firstly the target for new houses has suddenly been raised from 150 to 200 without consultation or explanation. This is wrong.

Secondly regarding MUW012 Revised and risk of flooding on that site. The well documented geology of the area results both in surface water run off and also and importantly rising water and springs in various places due to the different porosity of the layers below ground. Such rising water and the varying spring line have been seen by many local residents. The problems at the adjoining Hunters Gate development included both surface water run off and also water rising through floorboards apparently due to rising water from underground. For the adjoining MUW012 the developer caused a public presentation to be made of what action for attenuation of surface water run off would occur but which made no mention was made of rising ground water or of the spring line which varies with heavy rain.

It is thus not known what if any expert opinion regarding rising water has been included or indeed whether the developer failed to include rising water as one of the matters within the presentation. Failure to include rising water from the terms of reference may have occurred. It looks suspicious that the proposal to increase the size of the attenuation area may be a hidden way to address this issue of rising water without acknowledging it.

It would appear to be negligent of the Council if it simply accepts proposals on surface water run off and attenuation and choses to try to ignore the issue of rising water. A proper Hydro-Geologist's Report really should be required when considering whether MUW012 is suitable for development.

RESPONSE

See above response to Mr and Mrs Brian Jackson

Question 14 from:	Helen Hill
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
Please find enclosed a petition which has been sent to Much Wenlock Town Council by concerned residents in Hunters Gate and the immediate surrounding area. We are demanding that immediate action is taken to alleviate the flooding Hunters Gate has experienced in 2007 and 2020, which resulted in homes and garages being flooded.	
Residents are aggrieved that whilst flood defences have been installed and measures for householders provided to the north and east of the town nothing has been provided at Hunters Gate, which has had a known flooding issue since 2007.	
Despite three technical surveys no action has been taken and we understand that the funding allocated to solve the problem has now been spent elsewhere.	

We consider that we are being bullied, since we are told the issue will only be solved if additional housing is built on land adjacent to Hunters Gate. Other flood defences in Much Wenlock have been built without the need for additional housing. We also fear that additional housing will add to the problem, not solve it.

We are demanding to be treated the same as other residents in Much Wenlock as we pay the same rates and taxes, and for

RESPONSE

See above response to Mr and Mrs Brian Jackson

Question 15 from:	Chris Tyler
Subject:	Local Plan
Portfolio Holder:	Robert Macey
Director:	Mark Barrow
QUESTION	
<p>My question concerns the Shropshire Council Open Space, Sport & Recreation Interim Planning Guidance 22nd September 2010. The guidance suggests a ten-minute walking time to leisure and recreational facilities.</p> <p>“Why is MUW012 supported by S C when it falls outside the recommended time to walk to all forms of recreation and services including the library, surgery, church, public houses, playing fields and play area as well as the William Brookes school, thus encouraging motor journeys, further pollution and greater pressure on the already problematic area at the Gaskell Corner when other proposed sites within the guidance time are available such as a combination of MUW001, 002 and 008?”</p>	
RESPONSE	
<p>Whilst accessibility to services is an important feature of the Sustainability Appraisal (SA) and site assessment process which supports the Local Plan, the council must look at the full range of considerations in arriving at conclusion on sites. The SA and site assessment process will be available to view as part of the consultation process.</p>	

Question 16 from:	Alan Edwards
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
<p>Are you prepared to let Much Wenlock become a dormitory for larger industrial conurbations and damage its unique landscape setting and infrastructure? I contend a development of the proposed size is unsustainable. The existing infrastructure could not cope and the lack of local employment means residents will have to commute to more industrial areas many miles away thereby increasing the carbon footprint and impact on the environment.</p> <p>We are currently going through unprecedented times. To my mind one thing that has become abundantly clear through the Covid Crisis is the need for greater self sufficiency. How can any</p>	

responsible body consider committing high class agricultural land for a housing development that is both unwanted locally and has the potential to significantly increase the dangers associated with flooding in such a high flood risk area?

RESPONSE

The overall strategic approach is to provide balanced growth encompassing housing and employment opportunities. Whilst there is a focus on opportunities for employment provision in Shropshire's larger centres, the general approach to balanced growth is reflected in the strategy for individual strategies. In the case of Much Wenlock, Policy S13 of the Draft Local plan provides the potential for 2 hectares of employment land, on land identified in the Much Wenlock Neighbourhood Plan, to support the delivery of the housing requirement over the plan period to 2038.

Question 17 from:	Howard Horsley
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow

QUESTION

I am informed that you are accepting questions to be put before the Cabinet Meeting on housing matters the 20th July 2020. As a resident of Much Wenlock and a former member of the initial Telford Community Council I have a question which is of wide significance and needs answering.

I trust that it can be put to the Cabinet members. The question is as follows -

Under what dated resolution or decision record did the Shropshire Unitary Council unilaterally rescind its right to exemption from any obligation to contribute to the meeting of national government housing targets, rather than simply meeting local need? This exemption, inherited from Shropshire County Council, arose from the agreement to make a large area of land available within the historic county for the 1968 designation of Telford New Town, extending the area already designated for Dawley New Town, and was intended to expire only when Telford reached its target population of 220,000, a target not yet reached.

RESPONSE

As a minimum, Shropshire Council should seek to meet its defined housing need which is established through a nationally agreed methodology. Through the Duty to Cooperate process, the Council seeks to establish the level of any cross boundary need with neighbouring and closely associated Local Authority areas, including Telford. In this instance, no cross boundary need with Telford has been established.

Question 18 from:	Jim Bunce
Subject:	Local Plan
Portfolio Holder:	Rob Macey

Director:	Mark Barrow
QUESTION	
<p>In respect of site CST021 many technical assessment are mentioned in the pre-submission Draft Local Plan and are crucial to support the evaluation of the site's viability and deliverability.</p> <p>Such assessments are also required by the NPPF Para 172 for evaluating Major Developments in protected areas such as CST021.</p> <p>For CST021 please indicate which of the following have been carried out:</p> <ul style="list-style-type: none"> • a Transport Assessment • a detailed botanical survey • a Heritage Assessment • the definition of "appropriate vehicular" access to the site • the definition of "appropriate buffering" for both the Jack Mytton Way and the mature trees on (or in the proximity to) the site <p>If these have not been carried out, please confirm that they will be carried out and be available for scrutiny before the Planning Inspector reaches his/her decision upon sites within the AONB.</p>	
RESPONSE	
<p>The technical assessments mentioned will be needed at the planning application stage and the evaluation of 'appropriate vehicular access to the site' and 'appropriate buffering' are matters for the development management process. The need for these detailed assessments has been informed by the Council's site assessment process carried out during the preparation of the Local Plan.</p>	

Question 19 from:	Trefonen Rural Protection Group
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
<p>When reviewed against current National and International health, social and economic circumstances:-</p> <ol style="list-style-type: none"> 1. Does the Cabinet believe that by using the Economic Growth Strategy 2017-2021 as the basis of the Draft Final Plan that it can be considered "sound" under examination? 2. a) Does the Cabinet believe that the "High Growth" Housing Target in the Draft Final Plan is "deliverable" over the next 5years by private enterprise beyond the control of the Council or Central Government? b) Will the Cabinet consider an amendment of the Housing Target from 30,800 to 28,690 until the next 5yearly Partial Local Plan Review? 	
RESPONSE	
<ol style="list-style-type: none"> 1. In ensuring 'soundness', a Local Plan must be positively prepare, justified, effective and consistent with national policy. It is considered the Draft Plan before Cabinet can achieve 	

these requirements. The Economic Growth Strategy 2017-2021, alongside a number of other Council strategies, has been a material factor in the preparation of the Draft Local Plan and provides important local context to the vision and strategic approach delivered through the Draft Local Plan.

2. A) It is considered that the housing requirement proposed in the Draft Local Plan can be delivered in a sustainable manner through the strategic approach to the distribution of development.
- B) It is considered the housing requirement is appropriate for the County and on this basis a change is not proposed, but of course this is still subject to further consultation and examination.

Question 20 from:	Bridgnorth Town Council CPRE
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
<p>“With regard to site allocations in the Local Plan Review, why is there no mention that Bridgnorth Town Council prefers future development to be at Stanmore, and is opposed to the Tasley Garden Village proposal?</p> <p>Further, why have points raised by the Town Council in its detailed submission dated 10th June not been addressed in the report being presented to Cabinet?”</p> <div data-bbox="284 1245 335 1305" data-label="Image"> </div> <p>20-07-20 CPRE Question for Cabine</p>	
RESPONSE	
<p>The views of all parish and town councils are an important part of the plan making process, and the recent views expressed by Bridgnorth Town Council as part of the Regulation 18 stage of preparation, have of course been considered. It is equally acknowledged that the Town Council's stated views differ from that of the conclusions of Shropshire Council officers on the proposed direction of growth for the town. Whilst it is not considered necessary for the Cabinet Report to have specifically addressed this, there is general acknowledgement in the report that there have been instances where local consensus has not been achieved.</p>	

Question 21 from:	Jane Rylands
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow

QUESTION

What is the rationale for weakening the Council's current open space policy (contained within SAMDev MD2) that stipulates that all developments should provide **at least** 30 sqm per bedroom? The proposed draft policy DP16 proposes a new flexibility on quantum and an assertion that the Council will adopt the notion of 'quality over quantity' when considering open space within new developments. No indication is given as to what sort of spaces will constitute the 'exceptionally high standard of provision' which will warrant a reduction in quantum. This amendment would remove an important safeguard against over-development and appears to be nothing more than a knee-jerk reaction to current litigation against the Council regarding interpretation of its current open space policy. I fail to see how this new policy can support other policies within the new draft Plan and appears to be contrary to the principles of SP1 'The Shropshire Test'.

RESPONSE

It is considered that the combination of draft policies DP15 on Green Infrastructure and DP16 on Open Space, provides an appropriate and robust basis for the provision of good quality open space with new development. The quality of open space provision will be assessed based on the individual merits of the site, but it is equally important to note the draft policy states that fragmented parcels of open space will not be acceptable. The Council's Green Infrastructure Strategy, which will be available at the consultation, will provide further information on how the objectives of green infrastructure can be achieved in settlements.

Question 22 from:	Charles Green, CPRE
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow

QUESTION



20-07-20 CPRE
Question for Cabine

1. Will Cabinet send figures back to be re-done, in order to avoid them being found unsound at public examination?
2. How can members form a view as to the soundness of the Pre-Submission Draft without sight of this mass of new evidence?
3. In view of the extent of all this new evidence yet to be published, the continuation of Covid-19 restrictions, and the likely overlap of this consultation with that on the Draft Housing Strategy, will this consultation be extended beyond the proposed eight weeks?

RESPONSE

1. The Plan seeks to deliver around 300 hectares of employment land over the plan period to 2038 to ensure balanced growth. It is acknowledged that the delivery of employment can be challenging, and the Draft Local Plan has sought to tackle this by seeking to allocate additional employment sites within Shropshire's main towns only, above those allocations already provided for in the adopted SAMDev Plan. It is acknowledged the amount of land proposed to be allocated for employment purposes exceeds that which is sought to be delivered. It is considered this is important in order to ensure sufficient choice and competition to the market, to deliver on the urban focussed approach to growth, and to ensure the plan provides sufficient flexibility for changing circumstances.
2. It is acknowledged the Draft Local Plan is a product of many pieces of background evidence. It is the role of officers to consider and prepare the draft Local Plan taking this evidence into account;
3. It is considered that the proposed eight week consultation over August and September is sufficient to allow the public to have their say in proposals in a meaningful manner.

Question 23 from:	David Cooper
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
<p>Question 1. At the Cabinet meeting on 15th June, I asked if it could be confirmed that no new proposals for sites, which had not been subject to a regulation 18 consultation, would be included in the proposed pre-submission draft of Shropshire's Local Plan. The answer I received was that no such assurance could be given, but that:</p> <p><i>"Should the draft Local Plan include proposed allocations which were not subject to the 'preferred sites consultation' between November 2018 and February 2019 under Regulation 18, the public will have sufficient opportunity to comment on their inclusion through the Regulation 19 consultation"</i></p> <p>S1.4 of today's Cabinet report on the draft local plan states that:</p> <p><i>"The Pre-submission Draft of the Plan represents the Council's 'Regulation 19' version of the Plan. In line with national regulations the Council will seek representations through a consultation process on the Pre-Submission Draft Plan. The public and other stakeholders will be asked to make representations by considering whether the pre-submission version of the Local Plan is 'sound' based upon a set of nationally prescribed criteria."</i></p> <p>The draft plan for the Bridgnorth area now includes a site allocation for 1,050 dwellings, 16Ha employment land, a new local centre, 20Ha Green Infrastructure, a 19Ha linear park, and 41.5Ha land which would be used for "Future Growth" beyond 2038. This entire site area is SW of the A458, mostly on land which was not previously identified as potentially developable under the Strategic Land Availability Assessment. The proposal only emerged in March this year, over a year after the Preferred Sites consultation was concluded.</p>	

Please can you explain how consultees, including the public, are able to make an effective comment on the appropriateness (or otherwise) of including this site within the limitations of a regulation 19 consultation and its emphasis on the overall “soundness” of the plan?

Question 2 Para 5.62 of the draft local plan, on page 175, makes the following statement about Highway Infrastructure in the Bridgnorth area:

“5.62. Due to the scale of development proposed, it is essential that appropriate improvements to the highway network are undertaken in order to support this development and mitigate any impact. To inform these improvements a strategic assessment of the highway network will be undertaken. This will be supported by site specific highway assessments for the site allocations.”

This appears to be saying that there is a potential impact on the entire highway network around Bridgnorth from this development proposal, but that Shropshire Council isn’t clear as yet what it is or what improvements would be needed. Under the circumstances, how is the Council able to reach a conclusion about the appropriateness of the proposed scale and location of future development around Bridgnorth and support a proposition that an appropriate pattern of development for the next few decades has been identified?

RESPONSE

Q1 The Local Plan has been subject to a number of consultation stages as part of its development, and there has also been an emphasises on ensuring opportunities for more localised engagement where specific issues have been raised, including where additional sites have been proposed for consideration. All this consultation and wider localised engagement, carried out during the Regulation 18 stage of plan preparation, has helped to shape the Draft Local Plan before Cabinet. Whilst the Regulation 19 consultation process is focussed on the soundness of the Plan, there continues to be an opportunity for the public to state whether they feel the proposed strategy is positively prepared; justified, delivering an appropriate strategy taking into account reasonable alternatives; effective; and consistent with national policy.

Q2. The allocation of land for development should be supported by proportional evidence. In this instance both main development options in Bridgnorth at Tasley and Stanmore, covered in Appendix 2 of the Cabinet paper, have been accompanied by Transport Statements which have been taken into account in the wider site assessment process. It is accepted that the allocation of land for development in a Local Plan establishes the principle of development, but it is important that through the development management process, the development guidelines which accompany the allocation should be adhered to. In the case of Tasley, it is proposed this includes the preparation of further masterplanning work and the preparation of a Supplementary Planning Document to be used a material planning consideration.

Question 24 from:	David Coe
Subject:	Local Plan
Portfolio Holder:	Rob Macey
Director:	Mark Barrow
QUESTION	
1. Officers are recommending allocation of a site at Tasley to accommodate all of Bridgnorth’s hous-ing growth plus a modest area for employment at Stanmore. A Garden Village at Stanmore to de-liver a cohesive new community with housing and employment was previously the Council’s	

'pre-ferred option'. Consultation brought revision to ensure the country park was not touched. Why has there been a complete 'about face' and why has Stanmore Garden Village been removed? 2. The decision to ignore Stanmore Garden Village at Bridgnorth and choose Tasley Garden Village has clearly been made in great haste as the latter was not known about by Shropshire Council Officers until March 2020 and by April they were telling people it was their preferred site. The decision to support Tasley appears to have been made before the evidence base has been put together. The Officers in the Cabinet Report acknowledge the importance of consultation on the Local Plan, there appears to have been a complete lack of democratic process in this; if an alternative site arises at a late stage, the fair approach is to carry out consultation on both schemes together. Why is this not being done? 3. After Taylor Wimpey finished their 'consultation' on Tasley in June, Morville Parish, Tasley Parish and Bridgnorth Councils held special meetings to decide the position they would take on Tasley. All 3 roundly rejected the proposal and Bridgnorth Town Council then voted 6 – 2 to continue to support the Stanmore site. Given the Officers in the Report have stated clearly the need for extensive consultation on the Plan, why have the Cabinet not been made aware of this in the agenda documents and why have those who have considered specific and important planning matters at a special meeting had their views completely ignored? 4. A high need for housing and employment growth has been identified for Bridgnorth. The question for the Local Plan Review is about meeting the needs of Bridgnorth in the right place. The reasoning for the need is employment growth led, to bring inward investment and allow existing businesses to expand, to the tune of 16ha need. The best location for employment is around Stanmore where demand shows businesses want to be as it is full and where existing business needs to expand but employment on its own cannot deliver the benefits of a new community. Housing, jobs and new facilities next to each other lead to sustainable development. The contained landscape of Stanmore Garden Village can deliver an exciting development of a new garden community to meet these needs with high quality design, with a mix of tenure of housing that exceeds the policy requirement and with long term stewardship and legacy of the Apley Estate. Tasley is in the wrong place to meet the need, there is no existing employment base, landscape impact is greater and Taylor Wimpey will build and disappear. Stanmore is the more sustainable option, why is it no longer the favoured site? 5. The Council acknowledge 'exceptional circumstances' exist to expand Stanmore Business Park (which is currently FULL) and that acknowledges that Stanmore is the right place to put jobs – where companies want to be. So why is 16 hectares more employment land proposed at Tasley which local agents say is in the wrong place and there is no demand for? 6. Many residents of Bridgnorth commute to Telford and the Black Country to work and new housing at Tasley means driving about 7 miles extra each day than a new resident at Stanmore. If Shropshire has a 'Climate Emergency' how does making people further travel further (total has been estimated at 2 million miles a year) square with that? 7. Stanmore Garden Village is promoted by landowners with an interest in a legacy and experience of long term stewardship. They want to provide an exemplar in high quality design comparable to well renowned schemes at Poundbury in Dorset and Nansledren in Cornwall. They own all the land needed to deliver a

RESPONSE

Appendix 2 to the Cabinet report provides the summary of material planning considerations officers have taken into account in reaching their conclusions in the Tasley and Stanmore options. Officers have also directly engaged with the local town and parish councils on this matter, and have welcomed the debate and views raised on this issue as part of the regulation 18 stage of plan preparation, which have all been considered. The upcoming consultation will allow further consultation on the Draft Local Plan and will allow the public and other to raise comments on how appropriate they feel the proposed strategy for the town is.

Question 25 from:	Michael Burton
Subject:	Local Plan
Portfolio Holder:	Rob Macey

Director:	Mark Barrow
QUESTION	
<p>I live in Chelmick Drive, Church Stretton. Whilst this means that one could be seen as an automatic objector to the Snatchfields site (CS2021), I have genuine concerns about the potential impact its development would have on the AONB which makes the town a special case and, based on my knowledge and experience, do not believe it to be the best approach to delivering affordable housing.</p>	
<p>I would like to put the question below to Councillor Robert Macey, Portfolio Holder for Housing and Strategic Planning. For ease of reference, I attach my submission dated 7th February 2019 as it gives breakdowns of the affordable housing provision and open-market sales figures referred to within the question, which is as follows:</p>	
<p>Do you agree that the Snatchfield site is not the best means of delivering Affordable Housing in an Area of Outstanding Natural Beauty, given the points below?</p>	
<p>i) The site follows the principle of cross-subsidy which is not appropriate where there is a limited supply of land and development is constrained by AONB related directives. This is because the delivery of any given number of affordable homes would bring with it a greater number of open-market homes, the latter further encroaching on the AONB and being highly visible from elsewhere within the AONB (contrary to the site promoter's claim).</p>	
<p>ii) Reliance on cross-subsidy is not necessary as some Shropshire Council S106 Agreements specify that a developer's affordable housing contribution may be spent in other areas, implying that monies so received elsewhere could be used to comply with special case requirements to protect an AONB, by funding affordable housing in Church Stretton without the need for open-market development. This would have the additional benefit of avoiding a potential over-supply of open-market homes, given the transaction statistics on Page 3 of my 2019 submission.</p>	
<p>iii) Furthermore, minimum development numbers cited for affordable housing contribution do not apply, as being within an AONB gives Church Stretton the same status as a Designated Rural Area, so that an affordable housing contribution threshold of less than 10 units can be set and is said in the NPPF to be five units or fewer - which could imply only one. In addition to affordable housing funding drawn from contributions referred to in ii) above, therefore, it could also be obtained from small-scale development which is an established pattern in Church Stretton.</p>	
<p>iv) Page 2 of my submission provides figures for Affordable Housing delivery between 2009 and 2018, correct to the best of my knowledge but you will be in a better position to verify their accuracy. Over and above new affordable homes constructed to replace those lost in the demolition of Windsor Place, it appears that of around 97 entirely new-count completions some 81 did not rely upon open-market housing on the same site. In addition to being a good level of provision for a town of this size, Shropshire Council and the provider should be applauded as it is precisely what is needed to best protect the AONB - affordable housing provision without land being taken for open-market units. For the sake</p>	

of succinctness I will not recite all of the edicts and guidance relating to the requirements to protect an AONB in a planning context as you should be aware of them already, suffice to say that as the town is within an AONB Shropshire Council has a duty incumbent upon it to treat Church Stretton as a special case, and not apply countywide-derived, general policy.

v) There is a very real danger that relaxation in relation to a site the size of Snatchfields will be seen as a "door opening" precedent by developers known to have schemes on other land, which would have a massive impact on the AONB if they could not be resisted. By contrast, rigid open-market development constraint can have the benefit of delivering affordable housing by bringing forth exception sites; owners having the incentive to make their land available because the best value is to be derived from recognised affordable housing plot prices, and reducing any tendency to keep it from the market in consequence of the prospect of disposal for open-market development.

I do hope it will be seen that whilst my objection to the Snatchfields site could easily be thought of as the inevitable resistance of a nearby householder, I am truly concerned about the need to protect the AONB and that the special case it creates is not being adequately recognised, and believe affordable housing can be provided in Church Stretton by means other than open-market housing, this being based on my working full-time in the sector.

RESPONSE

Shropshire Council considers that the most effective means of delivering much needed affordable housing in Shropshire, is to provide a variety of delivery mechanisms, the suitability of which will vary from location to location. In Church Stretton it is considered that the delivery of affordable housing through a site allocation will complement that achieved through mechanisms such as affordable exception sites and cross subsidy exception sites. It should also be noted that open market housing can also contribute to meeting local needs. The need to safeguard landscape and scenic beauty of the Shropshire Hills AONB will be addressed through an evidence base document setting out an exceptional circumstances argument. This will be available during the consultation period.