

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

<b>Representor unique Part A Ref *</b>	A0088 MW Refresh Group A0028 MWTC A0469 MW Civic Society A0231 Howard Horsley A0307 Alan Edwards A0416 Clive Morley A0499 Jim Orves A0471 Sue O'Dowd
<b>Matter</b>	<b>3</b> Development Strategy (Policies SP1 – SP15)
<b>Relevant questions nos.</b>	4, 9, 19

### Question 4

1. **SP2. 7. p13** Ignores adopted Neighbourhood Plans which are not at present in line with the proposed Local Plan. Much Wenlock Neighbourhood Plan (MWNP) was adopted by Shropshire Council (SC) in 2014 and is the statutory planning document for Much Wenlock until 2026.
2. **SP2 5b p13** *Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.*

### Successful delivery through the MWNP

3. Shropshire Council (SC) is ignoring the continuing and diverse growth which is being maintained under the policies of the existing MWNP as a rural Key Centre. The Reg 19 Submission from Much Wenlock Neighbourhood Plan Refresh Group (a0088), dated Feb 2021, shows that the MWNP is working well, see pages 28-30, and pages 35– 41. (Para. 4.10).
4. The MWNP Monitoring Group presented a formal review of the MWNP to the then SC Planning Policy and Strategy Manager on 20th Feb 2017, which was accepted and endorsed. Included as a review comment in this endorsement was a statement by the current Planning Policy and Strategy Manager, Edward West:

*'The monitoring procedure provides compelling evidence of housing development occurring on track and perhaps ahead of anticipated target levels'. And 'I would agree with this conclusion based on the levels of commitments and completions since 2013. I agree that this indicates 'no compelling evidence for the current NP to release further land at this stage as part of the current NP plan period to 2026.' [ Reg 19 page 30 Para 4.2.2].*

5. It is also clear that the independent assessor accepted that the MWNP could be viable without a designated development site if targets could be met (Much Wenlock Neighbourhood Plan, Assessor's Report, Nov 2013).

.6. SC has not explained why it is now ignoring the MWNP policies it adopted for Much Wenlock in 2014, and has not provided any evidence that the Much Wenlock Neighbourhood Plan has failed or is not fit for purpose. The evidence is to the contrary, as shown in Reg 19 Submission (a0088) Much Wenlock Neighbourhood Plan Refresh Group (MWNPRG).

7. The continuing successful delivery of housing completions through the current MWNP policy has been confirmed this year by Shropshire Council and an Independent Inspector; see *Appeal Ref: APP/L3245/W/21/3281756, dated 17<sup>th</sup> May 2022:*

*Para 26. .... The Much Wenlock Neighbourhood Plan (2014) (the Neighbourhood Plan) establishes a housing guideline for Much Wenlock of 130 dwellings in the period 2013-2026. The Council's evidence at appeal identifies that existing housing completions and current housing commitments in Much Wenlock during that period fall short of the target by circa 20 dwellings.*

*Para 27. However, the Council expresses confidence that delivery of housing to address the 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. Without robust evidence to the contrary, I am satisfied that the housing guideline for Much Wenlock appears likely to be met.*

## **The Draft Local Plan**

8. SC's development completion figures for Much Wenlock were presented at a public meeting, attended by more than 100 residents, in Much Wenlock on 3rd January 2019. SC informed the meeting that the beginning and end dates of the MWNP needed to be in line with the SC Core Strategy and Local Plan 2016 – 2036 which set a target for development of 150 houses.

9. In doing so, it allocated a single 'preferred site' (known at that time as MUW012 for 80 dwellings). The justification for this allocation was that it provided 'certainty and deliverability' to achieve the housing numbers. It was then raised to 200 without justification in terms of the town's needs. (*Appendix 5 A5.1 A5(i) p 345 SCLP See page 41 para 4.15.2. Reg 19 submission MWNPRG*). However, a large single site conflicts with the MWNP policies and was without proper community consultation. (See Matter 1 submission.)

10. A large single site conflicting with MWNP policies, and without full community consultation, also conflicts with government guidance on Neighbourhood Planning. (If major changes to a NP are made, e.g., a large-scale development or changes to the development boundary to admit a development, then a full consultation should take place accompanied by a referendum).

11. The recently adjusted figures reported by SC are as follows:

- Number of dwellings completed in Much Wenlock between 2016 – 2019: **32 dwellings.**
- Number of dwellings committed with Planning Permission or Prior Approval at 31st March 2020: **21 dwellings.**
- Number of dwellings on proposed allocations within the draft Shropshire Local Plan (2016 – 2038): **120 dwellings.**
- Add on 'windfall' allowance to achieve the proposed residential guideline within the draft Shropshire Local Plan (2016 – 2038): **27 dwellings.**

Conveniently totalling **200 dwellings**

These figures show that Much Wenlock developed 53 dwellings in the four-year period from 2016 - March 2020, representing 13.25 dwellings per year. The 53 dwellings listed above were all delivered on windfall and exception sites. (*Appendix 5, p345 Draft Local Plan*).

12. SC's figures (above) show permissions and delivery for annual 'windfall' or exception sites to be 13.25 per year. On this basis the windfall delivery from 2020 for the next 18 years until 2038 could be a further 238 dwellings in addition to the 120 proposed on MUWVAR012, see above. The implication might be that Much Wenlock could exceed the 200 dwelling target for 2038 by 40-50%. This is development 'creep' with no identifiable infrastructure improvements.

13. The delivery through MWNP suggests a rate of 7-8 per year. This may not be always achievable but the assumption by SC that **only** 27 will be built by 2038 as windfall or exception is unrealistic.

14. SC's justification for the rise to 200 dwellings for MW is based on the existing completions/permissions and the demands of commercial 'viability', hence 120 for the scheme at MUW012VAR. The figure of 27 appears to be mathematical neatness.

15. In accordance with the NPPF, the delivery of numbers of dwellings should not be the whole ambition for the Local Plan. They must also be of the right type to meet local needs. We remain concerned about the lack of two- bedroom properties and single level developments which are suited to young first- time buyers, the elderly or disabled, SC Homepoint data suggests a continuing need for affordable houses to meet local needs.

16. Close examination of the **Site Assessments** carried out by SC in Much Wenlock Place Plan site assessments 2018, 2019 and 2020 show it has failed to evaluate alternative options towards policies which would serve the needs of the town better. Its methodology for sequential testing is a failure and inadequate.

17. Our submission identifies a series of significant flaws and gaps in SC's site assessment. SC has not set out its reason for its choice of a single development site of MUW012VAR. (<https://sites.google.com/view/mwnprefresh/home> - See page 38, paras 4.11, 4.11.1 - and the review on the MW Refresh Group web site. [https://drive.google.com/file/d/1gTI8r9BR-E8y\\_lyxYLjMavyHuDx9N9Y3/view](https://drive.google.com/file/d/1gTI8r9BR-E8y_lyxYLjMavyHuDx9N9Y3/view)).

18. In late 2021, planning permission was granted for a further 75 dwellings at the Ironbridge Power Station development which falls within the Much Wenlock Place Plan area. This is in addition to total of a staggering potential for 2476 houses across 16 sites (identified in Shropshire Council's Much Wenlock Place Plan Area Site Assessments, 2020).

19. Each site assessment does not include consideration of positive outcomes for the town, only it seems, the ability to produce numbers of dwellings despite SC's recorded intentions in its own Place Plan and the MWNP. There is no assessment of type of dwelling according to the policies of the MWNP

## Question 9

20. The NPPF states that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment.

3.3 SC Draft Local Plan P17: Shropshire Council has failed to carry out a housing needs survey for Much Wenlock in recent years. The last was in 2006, carried out by the then Bridgnorth District Council.

#### **Question 19**

***Is Policy SP14 justified effective and consistent with national policy? Should the corridors be marked on a map or plan? Is this policy consistent with other policies in the Local Plan? Is it the purpose of this policy to allow for significant growth in addition to that allocated in the Local Plan, including development in the Green Belt?***

21. In section SP14 'Strategic Corridors', at paragraph 3.142a, the first corridor is described as 'Eastern Belt M54/A5, A41/A464 and A4169/A458/A454. It is difficult to connect these roads into anything resembling a corridor and it appears that the Council has simply included all the A-class roads that lie within the County Boundary (i.e. avoiding Telford and Wrekin). Clarification of exactly where this 'corridor' is located and how it connects together is lacking in SP14 and this should be addressed; a plan would be useful.

22. The Council's inclusion of the A4169 and A458 points to Much Wenlock being part of the 'Eastern Belt Strategic Corridor'. It should be clear that this section of those two roads is unsuitable to accommodate the potential development pressures that will come with being identified as within a 'Strategic Corridor'. The junction of the two roads in Much Wenlock (Gaskell Corner) is already under significant pressure from HGVs, buses, agricultural vehicles, commuters and pedestrians, and has proven itself incapable of being upgraded (by the designers of the Ironbridge Power Station proposal). Nor is a junction improvement included in any Infrastructure Plan, therefore Much Wenlock will be impacted by an unnecessary increase in traffic at the junction, which will lead to an increase in the already severe problem of vehicles rat-running through the town.

23. Further to this there is no mention in the *Much Wenlock and Surrounding Area Place Plan* of Much Wenlock being a suitable town to sit along a Strategic Corridor and, like the *Strategic Infrastructure Implementation Plan*, there is absolutely no provision whatsoever for the highway infrastructure to be provided to accommodate further development. This means that the policy is inconsistent with other policies in the Local Plan.

24. In fact, there is not a single document amongst any of the Core Documents or the documents providing the Evidence-base that proposes, discusses or even *mentions* the highway improvements that would be necessary in Much Wenlock to safely accommodate

the traffic impacts from being on a Strategic Corridor, further confirming that policy SP14 is inconsistent with other Local Plan policies.

25. Plans to provide a bypass of both the A458 and the A4169 in Much Wenlock, taking through traffic away from the town, were abandoned in the 1990s. This left the town with traffic volumes that already place an undue burden on the town from noise, air pollution and safety hazards.

26. This means that along the proposed SP14 Strategic Corridor the towns of Bridgnorth, Ironbridge, Telford and Shifnal will all have the relief from congestion, noise, pollution and accidents provided by their bypasses. Only Much Wenlock is expected to endure these impacts with the Strategic traffic joining existing high volumes passing *through* the town, rather than around it. In the Much Wenlock Town Council's 2022 Residents Questionnaire, a majority of respondents said traffic options should consider how traffic might avoid the town.

27. Despite the evidence provided to Shropshire Council, it has clearly not understood the inadequacy and lack of proper, appropriate infrastructure (available for many years in all other comparable Shropshire towns) in Much Wenlock. This has not prevented Shropshire Council from proposing poor strategic policies like SP14 whilst being fully aware that the infrastructure in Much Wenlock cannot accommodate the associated traffic.

28. In their response to Reg19 objections (sd01401 and gc4o-sd01403), SC said:

*“Shropshire Council considers that Policy SP14 and the employment development strategy for Shropshire is appropriate, effective, sustainable, and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances.*

*The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.*

*In relation to the release of additional greenfield sites through the Local Plan, it is considered that sufficient flexibility has been accorded to the release of such sites along the strategic corridors. In articulating the strategic approach for the Local Plan, Policy SP14 recognises that the County has significant areas within the Green Belt and the Shropshire AONB, and a high-quality environment with a rich biodiversity, landscape and historical heritage that must be afforded appropriate protection. Consequently, further development in the 'Strategic Corridors' beyond those sites already committed or proposed to be allocated for development will be determined through a sequential preference for principal settlements, strategic sites (and strategic settlements see Minor Modifications) and brownfield redevelopment opportunities with greenfield land releases to be considered only in exceptional circumstances where the benefits of the proposal will clearly justify the development of greenfield land."*

29. This is a highly flawed approach and, as we note from the developer for MUW012VAR, it is already being used as an excuse for large scale development:

- The Policy is not simply there to react to future development proposals, it is setting out a proactive approach for more development beyond the Draft Plan's own allocations. Yet there is no statement of justification or evidence that it is required.
- There is no need for a policy which explicitly identifies a growth corridor unless it wishes to promote one.
- If SC wish to anticipate and prepare for unexpected proposals, it can do this through the application of the other development management policies in the Plan.
- SC seems to consider a loose phrasing of 'appropriate protection' as adequate but does not assess the impact on settlements; the SA may be flawed in this respect.
- It is unclear whether key settlements such as Much Wenlock are subject to the 'growth strategy' beyond the current proposed allocation
- Nor is the appropriateness of the growth clearly defined, except that it is near public highways. Will it be tourism-related, how will it be defined as sustainable and will there be any investment in related infrastructure such as public transport?
- What are the exceptional circumstances that will apply to greenfield development?