

## Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11<sup>th</sup> June 2024**.

Name and Organisation:	Howard Horsley
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### Q1. To which document(s) does this response relate?

<b>a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.</b>	<input type="checkbox"/>
<b>b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.</b>	<input checked="" type="checkbox"/>
<b>c. Updated Housing and Employment Topic Paper.</b>	<input type="checkbox"/>
<b>d. Updated Green Belt Topic Paper.</b>	<input type="checkbox"/>

### Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	5.1 to 5.3, 7.1 (5&6), Appendix 7
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### Q3. Do you consider the document(s) are:

- A. Legally compliant      Yes:       No:
- B. Sound      Yes:       No:

### Q4. Please detail your comments on the specified document(s).

**Please be as precise as possible.**

Although I am about to strongly criticise aspects of the Updated Additional Sustainability Appraisal I do so recognising the pressures imposed upon officers in trying to respond adequately to changing demands upon them. A valid methodology is, however, crucial. Unfortunately, the amended proposals in respect of Much Wenlock fail to recognise or respond to the huge change in the perceived suitability of any site in Much Wenlock to sustainably cope with significant development. The main change in circumstances arises through the designation of Much Wenlock as the sole location in Shropshire within a Rapid Response Catchment, presenting the Highest Category of risk from flooding. This designation and its importance only became evident after the original process of site designation had begun, so a reappraisal is long overdue. (see continuation sheet)

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

**Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.**

### Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

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The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

## Howard Horsley: Continuation sheet 1

### Draft Shropshire Local Plan – Updated Additional Sustainability Appraisal

A lack of institutional memory seems to be the only legitimate explanation for an acceptance of the need to accommodate some of the unmet needs of the Black Country within the present boundaries of Shropshire, rather than exclusively within Telford and Wrekin. With the benefit both of memory and personal involvement I recall that the area of Telford New Town was a part of Shropshire which was designated to accommodate the overspill needs of Birmingham and the Black Country. It was slowly provided with the rail and motorway links to ensure that this link could become effective and sustainable. The land consisted largely of brownfield sites following centuries of mining and heavy industry. Land acquired under the powers granted at that time was reclaimed. Infrastructure including comprehensive drainage and road systems were developed to enable development. Scores of hectares of this reclaimed land remain available for development. Any continued overspill from the Black Country should be sustainably accommodated there and not within largely rural Shropshire with inadequate basic infrastructure and poor transport links to the Black Country.

Despite this background, it has been deemed appropriate to update aspects of the Draft Shropshire Plan in response to unmet needs within the Black Country. Any valid methodology for reappraisal must take into account other types of major change that affect the viability and sustainability of any site that remains under consideration.

The sustainability appraisal that has been presented as a new draft makes no mention of the designation, since the preparation of early drafts of the Local Plan, of Much Wenlock as a Rapid Response Catchment. This is the only such designation within Shropshire and it is also a designation presenting the highest category of risk. It means that, in extremis, property, infrastructure, livelihoods and lives can be at serious risk.

Such designations are very rare, not only elsewhere in the Midlands but also elsewhere in England. Moreover, the relevance of this categorisation has been demonstrated by the occurrence of flooding on an annual basis since 2018, within the area currently proposed as the “preferred site” for the building of as many as 120 new homes. It is beyond doubt that any new development in this location would fail the test of being sustainable, especially given the increasing academic evidence of the impact of climate change. It is, therefore, astonishing that no questioning of the current suitability of this site is mentioned in the Updated Additional Sustainability Appraisal.

### **Appendix 7**

Appendix 7 considers the suitability for development of a number of sites in Much Wenlock.

## Howard Horsley: Continuation sheet 2 on Sustainability

**Flooding:** At no point within this appendix is there any mention of the fact that Much Wenlock has been designated by the Environment Agency as the only example in Shropshire of a Rapid Response Catchment also presenting the highest category of risk. This omission, even if accidental, is inexcusable. The designation has altered fundamentally the sustainability of any new development within the catchment. Far from proposing an increase in house building the Additional Sustainability Appraisal ought to be taking into account the designation by now revising downward the figures.

The consideration of the individual sites in Much Wenlock within this document must, therefore, be regarded as outdated and lacking any validity. This is particularly so for the “preferred site” for a housing development of 120 new homes, since has been shown to flood so regularly. Moreover, dramatic photographs and video of the flooding exist and have been made available to Officers of Shropshire Council. Further copies can be made available, on request, to those who wish to carefully examine the phenomenon.

The suggestion in the assessment of site MUW012VAR that the development of the site could fund flood attenuation is frankly absurd. The ability of the planning authority to monitor and enforce suitable drainage provision, let alone a major attenuation scheme has been severely undermined by staffing cuts and loss of tried and tested expertise.

Three significant developments in Much Wenlock in the past 25 years have already demonstrably failed to meet the standards of compliance required in terms of surface water management.

1. In the case of Hunters Gate, it was necessary for Shropshire Council and Severn Trent Water to commission and fund at great public expense several substantial consultant-led investigations and reports, first to discover the nature of the installed drainage system and then why it failed to prevent serious flooding.
2. In the case of the Falcon Court development, it took several years, after the 2007 flood, to establish that its drainage system had been connected by the developer to a critical main water course without the necessary permission.
3. Most recently, a halt has had to be called to aspects of the development of the steeply sloping site of Callaughtons Ash 2, in the light of the failure of the developer to submit for prior approval a coherent and detailed drainage plan.

In each case public objections had been registered to the approval of the development on grounds of the impact on flood risk. In each case reassurances had been given and development permitted. In each case, the validity of the concerns of the objectors were vindicated by events. In the light of these repeated failures, combined with the present designation of Much Wenlock as a Rapid Response Catchment at high risk of flooding, the proposal to outsource a major flood alleviation programme to a developer, as an adjunct to a house building project, should have become entirely unacceptable.

### Howard Horsley: Continuation sheet 3 on Sustainability

To approve such a proposal would demonstrate a failure to prioritise concern for an almost inevitable increase in flood risk to neighbouring properties. It would also signal a lack of adequate concern for community safety and, in particular, the risks to residents downstream of the proposed development.

Repeating a mistake which has been shown to be disastrous in its outcomes and expecting a different outcome would seem to constitute corporate recklessness.

**Transport and Traffic:** A second major change affecting Much Wenlock which is not noted or commented upon in the sustainability appraisal is its fundamentally changed situation in respect of transport, traffic and travel. There is now the early prospect of 1000 new houses being built within the area of the Much Wenlock Place Plan.

The implementation of this major development removes entirely the case for additional house building, within the vulnerable Much Wenlock catchment, over and above local need in terms both of the number of homes and in terms of their characteristics.

Planning consent has already been applied for in the case of the first development on the site of the former Ironbridge Power Station. Since this development will initially lack its own community services it is inevitable that additional traffic will be generated in Much Wenlock. Services are over-stretched and congestion, parking and rat running through Much Wenlock's narrow streets in the Conservation Area are all acknowledged as significant problems already facing local residents.

The appraisal also fails to recognise the true limitations on the availability and reliability of public transport serving Much Wenlock. Although there are railway stations at Telford, at Wellington and at Shifnal it is not possible to access any one of those stations by a direct, regular and reliable bus service. Indeed, the only way to travel east, south or north-east on main railway lines, using public transport, is to take a bus west 10 miles to Shrewsbury and then retrace that journey by taking the next available train east to Wolverhampton to access main line rail services, hardly a route for sustainability.

Without significantly improved public transport it is difficult to envisage any new development in Much Wenlock which will not hinder the achievement of net zero. Given the overall scenario of flood risk, combined with transport and travel challenges, the possibility of new development in Much Wenlock being sustainable seems negligible.

**Agricultural Land Quality.** Site MUW012VAR is regularly cultivated with essential food crops. It lies on the highest quality agricultural land on the margins of the present development boundary of Much Wenlock. The present war in Ukraine has led to warnings about our national long term food security. Sustainability considerations thus mean that it is inappropriate to develop this site for housing in these circumstances.

Howard Horsley: Continuation sheet 4 on Sustainability

**Fairness issues in relation to this overall consultation.**

I have no wish to question the intentions of those who constructed this consultation. None the less, whatever the intentions, the consultation system must be considered almost entirely inaccessible to any ordinary member of the public. At the very simplest level it must be considered contrary to separate access to the documentation from access to the means of responding. These elements should have been made available on the same webpage. Moreover, the length and complexity of the material presented demands a level of research expertise limited to a small minority of the population. In addition, the time required to get a proper grasp of the issues is extraordinary. It thus defies the resilience levels of all but the most determined consultees and they must almost invariably be able to command a range of prior knowledge and expertise.

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### Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	1,8,10,17
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- B. Sound      Yes:       No:

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The policies outlined in the paragraphs identified above are unobjectionable but remain mere platitudes when examined in the context of Shropshire's development record and the planning proposed in the Draft Shropshire Council Local Plan. While it would be possible to provide evidence from different parts of the County I will limit my evidence to Much Wenlock where the proportion of elderly people is higher than average and where even the casual visitor can regularly observe residents with mobility problems. Much Wenlock is situated in a bowl with steep sides and the services in the centre. The preferred site for new housing is, however, on the town margin far from services.  
(See continuation sheet)

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

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Howard Horsley: Response to Shropshire Council proposals - Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs.

Continuation Sheet on issues in Much Wenlock

Approval has been granted in the past for housing developments at the furthest edge of the Much Wenlock bowl. The new "preferred site" for over 100 homes also lies at the furthest edge of the bowl. These sites are not only distant from services but also require most residents to descend and ascend a steep hill. Older People and those with special needs have the choice of trying to access distant services as pedestrians, via mobility scooters or by car. None of these options is easy or risk free, making the site now designated unacceptable. Each access option poses a substantial risk to the individual and moderately acute risks to other residents in streets that are already congested.

The "preferred site" for development and others on the margins of the town are also subject throughout to the risk, or the reality, of regular and severe flooding. This is a consequence of environmental factors implied in the designation of Much Wenlock as the only Rapid Response Catchment in Shropshire. It should not be necessary to point out that the risks arising from flooding events are likely to have a much greater impact on residents who are Older People and those with Disabilities and Special Needs.

While there are risks of flooding in every part of the catchment some sites available for development are less steep, less distant from services and are protected from flooding by an attenuation pond. Thus, it would be entirely possible to locate a site for housing development more appropriately to meet the needs of Older People and those with Disabilities and Special Needs. The current plan does not propose such a solution.

The evidence thus shows that the aspirations in paragraphs 1, 8, and 10 of the relevant consultation document have not been, nor is it proposed that they will be, observed in the actual implementation of housing policies in Much Wenlock.

It is beyond doubt even on this limited evidence, related to a single location, that the policy could only be considered legally compliant and sound if the entire process of production of the Shropshire Local Plan is to be permitted to be a complex illusion.

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Paragraphs 1-4. Although these paragraphs are intended to be explanatory rather than policy statements they incorporate assumptions which are contested. The first assumption is that the "Duty to Cooperate" implies a need to accept the demands to respond positively to excess demand in the Black Country for development land for housing or employment. To do so is to forget that the historic county of Shropshire gave up a huge area, now the New Town of Telford, specifically to respond to the excess demand for land to meet the needs of the Black Country and Birmingham. Much of the land assigned at that time remains available having been reclaimed from its previous brownfield status. It is here, with its well developed infrastructure and transport links, that any excess demands from the Back Country should continue to be met. (cont'd)

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## **Draft Shropshire Local Plan:**

### **Updated housing and employment topic paper. (Continuation Sheet 1)**

The second contested assumption in paragraphs 1-4 is that the issues raised by the Inspectorate can be handled as a discrete package, without any consideration of other changes recognised since the Draft Local Plan was initially put together. Some of those changes have been dramatic, including the impact of climate change. This has become ever more evident across many parts of Shropshire since the Draft Plan first appeared some five or more years ago. In some cases, the suitability of particular sites, proposed for development, has been severely undermined by the impact of climate change. To ignore new evidence in such circumstances simply builds up the risk that the Local Plan will end up being perceived as a planning embarrassment.

16.125

This paragraph claims that Much Wenlock “is considered to have a functional relationship to the Black Country.” Nowhere is any evidence presented which supports that claim. There is no public transport link to any part of the Black Country, by road or rail, nor are there specific employment links.

16.130b

This paragraph helpfully recognises something inexplicably unrecognised in the sustainability appraisal. Since the unpublished early drafts of the Local Plan, Much Wenlock has been recognised by the Environment Agency as the only Rapid Response Catchment in Shropshire. It is also noted as one of a small number of settlements in England at the highest risk. Development within such a catchment is very difficult if not entirely impossible to justify as “sustainable.”

Nothing in this paragraph suggests that there is an understanding of the serious implications of this categorisation. It means that the settlement is potentially subject to serious flooding, posing a risk to infrastructure, property, livelihoods and lives.

Adjusting development planning to respond to that designation is not something that the Draft Local Plan currently attempts. Indeed, paragraph 16.130b implies that ‘businesses as usual’ is an appropriate response. The sentence “*The proposed housing allocation is underpinned by a strategy which seeks to manage flood risk to the site and existing built form within the settlement.*” embodies an alarming complacency.

Those who produced this sentence may simply have fallen into the assumptions within paragraphs 1-4 of the document. These assume that the only thing that needs to be reviewed is the relationship with the Black Country. Such an approach is unacceptable and conceals a failure to review the new evidence. In respect of Much Wenlock, it demands a review of whether the preferred site in Much Wenlock remains viable.

## **Draft Shropshire Local Plan:**

### **Updated housing and employment topic paper. (Continuation Sheet 2)**

Such a review should also assess whether development on the preferred site would be likely to meet local needs. The Much Wenlock Neighbourhood Plan identified that a main focus should be on homes adapted to meet the requirements of older people and those with disabilities and special needs. This review should not hesitate to recognise that a preferred site, distant from services and liable to annual flooding, is now most unlikely to meet those needs.

16.130c

This paragraph locates Much Wenlock on what is best described as a mythical “A458 corridor linking to the Black Country.” How the concept of this “corridor” has originated has never been explained or justified to local residents. In reality the A458 is neither recognised, nor funded by the Department of Transport, as a trunk road.

16.133

This paragraph acknowledges that within the Much Wenlock Place Plan Area is the site of the former Ironbridge Power Station where a major housing development has been proposed and where an initial planning permission has been granted. There is, however, inadequate recognition of the pressure that will arise on services in Much Wenlock before such services are up and running within the site. This is a pertinent fact that ought to have been taken into account in assessing the desirability of any additional development within the flood zone of the Much Wenlock Rapid Response Catchment.