

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 11th June 2024**.

Name and Organisation:	Lesley Durbin Much Wenlock Neighbourhood Plan Refresh Group
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Q1. To which document(s) does this response relate?

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

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

Paragraph(s):	2.9 a b c 2.10 2.14 2.37
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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.

2.9 abc the uplifts are too high and affect only those parts of the county with geographic proximity to the Black Country resulting in an imbalance in development with North Shropshire.

2.10 Option One is not compliant without consultation and the agreement of the communities with NP's

2.14 the uplift of 600 houses at Tasley and a further 600 houses at IPS, (which is within the Much Wenlock Place Plan Area) adversely affects the rural settlement nature of Much Wenlock which 8.84 is proposing to protect under the Neighbourhood Plan scheme.

2.37 Key Centres should be removed from spatial strategies, they mostly rural settlements which require protection or improved infrastructure. Cont on separate 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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- No, I do not wish to/consider it necessary to participate in hearing session(s)
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The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.



Shropshire Council Updated Housing and Employment Topic paper April 2024

Addendum to consultation 18 05 2024

part b Lesley Durbin Much Wenlock Neighbourhood Plan Refresh Group

A consultation should be both transparent and accessible, a responder should expect to understand the questions asked to give a reasonable response. This consultation does not enable clear or reasonable responses. The questions relate to dense planning jargon and wide research which cannot reasonably be expected to be understood or undertaken by all. It is not for the unqualified responder to decide if a document is legally sound and compliant. That is the job of the inspector. Therefore the question 'do you consider the document to be reasonably sound and or compliant' does not properly comply with the duty to act fairly, or within legitimate expectation.

Contd from part b

Page 78 Cressage has an allocation of 80 dwellings. The Key Centre for Cressage is Much Wenlock, there is already an allocation of 200 dwellings in Much Wenlock itself, plus a further 1000 houses at IPS in the Much Wenlock Place Plan Area and an additional proposed uplift of 600 houses geographically linked to supply the needs of the Black Country at IPS

On **page 110** Much Wenlock is a combined Key Centre and Strategic Settlement with IPS. The only example on the Urban Land Supply Table which the combination of all current tables is proposing to deliver over-development, with no apparent improvement in infrastructure.

Page 111 Much Wenlock has been assessed as having a capacity of .5 hectares of employment land, making the allocation of 280 dwellings within the Key Centre an unsustainable equation for vehicular movements in travel to work.

16.85 Bridgnorth is in close road proximity to Much Wenlock, some 8 miles, the Black Country with Wolverhampton some 16 miles in distance and is connected to the West Midlands via the A4169/A458/A454 network, designated a strategic corridor. The A458 and A4169 directly cuts through the centre of the most populated residential area of Much Wenlock with little or no provision for the safe pedestrian movement of school children, the elderly and shoppers wishing to use the local High Street and thereby making a contribution to the sustainability of the town as a whole.

9.4d Much Wenlock is by default, because of other designations in this updated paper, firmly in the middle of a TTWA and in gc29 and gc28 specifically lists Much Wenlock as being suitable for meeting the need of black country development. The infrastructure of narrow roads through residential and school zones is totally unsuitable for meeting B/C needs.

16.125. The updated Housing and Employment paper states that *'The Much Wenlock Place Plan Area is located in east Shropshire and is considered to have a functional relationship to the Black Country. The entirety of the Place Plan Area is located outside the Green Belt.'*

There is no mention of the proximity to the Area of Outstanding Natural Beauty

16.126. *Much Wenlock is a small town and the only Key Centre within the Place Plan Area. The other settlements within the Place Plan identified as specific locations to accommodate development in the draft Shropshire Local Plan are the Community Hub village of Cressage and the Buildwas Community Cluster.*

Is Buildwas a 'Community Cluster' or part of a Strategic Settlement? There is confusion here.

16.127. *Proposed development guidelines for Much Wenlock envisage the delivery of around 200 dwellings and 2ha of employment land in Highley between 2016 and 2038.* Highley is not in the Much Wenlock Place Plan Area and therefore requires TTW

16.130. *Much Wenlock is a relatively small settlement and is subject to physical, infrastructure, environmental and other constraints that need to be considered when bringing forward development. For example:*

a. Much Wenlock is a historic settlement containing a large conservation area, archaeological interest and many listed buildings.

b. The town catchment has been designated as a highest category Flood Rapid Response Catchment and flood risk is a very significant local consideration, which impacts on the identification of development sites. 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.

Much Wenlock Neighbourhood Plan Refresh Group and the emerging Review of the Much Wenlock Neighbourhood Plan contend that it is neither possible or reasonable to manage flood risk on the 'preferred allocated site' for Much Wenlock.

- The updated proposals are unsound and does not make the draft LP plan any more acceptable
- There has been a poor consultation on the LP as a whole including previously resulting SC's weak understanding of MW
- Which leads to addressing the allocation of housing for the Black Country's needs in Much Wenlock; SC did not originally make it clear that Much Wenlock has been targeted as a location for this, and it is especially inconsistent with the established policy line that MW is 'limited development to meet local needs'

- There is no need for an allocation for the Black Country given the easing of top down targets, especially for Wolverhampton as one of the 20 largest cities in England
- Setting up Much Wenlock to be a commuter location for the Black Country has not been discussed and is unsustainable in planning terms
- Specifically, there is no public transport to the Black Country, which is extremely limited even to Bridgnorth and there is an acknowledged lack of wider infrastructure
- This means that an allocation will inevitably lead to increased car traffic and so be detrimental to SC's own stated ambitions towards net zero and addressing the climate change emergency.

Much Wenlock Neighbourhood Plan Refresh Group is also objecting to the Sustainability Appraisal.

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P4 All sites of less than 5 dwellings must include at least one M4(2).
P6 replace 'strongly encouraged' to 'must'
P10 remove 'Ideally'
P15 reduce 250 dwellings to 200, the higher figure will encourage developers to build 249 dwellings, 20% M4(3) and 70% M4(2) should be enforced
P16 20% M4(3) and 70% M4(2)
P19 the relevant settlements housing guideline should not be exceeded
27 the proportion of older people in Shropshire is higher than the national average and growing. Your policies do not go far enough in terms of numbers so are unsound Contd on separate sheet

(Please continue on a separate sheet if necessary)

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Shropshire Council Updated Housing Provision for older people April 2024

Addendum to consultation 30 05 2024

part b Lesley Durbin Much Wenlock Neighbourhood Plan Refresh Group

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Contd from part b

What we see in the updated paper is no understanding about how the laudable ideas and proposals about homes which are accessible and adaptable for all relate to decisions made on the ground.

The newly allocated "preferred site" for over 100 homes also lies at the furthest edge of Much Wenlock. This site does not comply with any of SC's current policies regarding walking distances to facilities such as the post office, the High St, the medical centre and play areas. Thus, leaving older people and those with special needs with 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, as it has been observed by many residents that our pavements are not quite what they could be, or even existent.

Dwellings for older people or those with special needs must be sited in easy distance from the town centre, there are several site options which can achieve compatibility with SC's high standards.

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 so far been, nor is it proposed that they will be, observed in the actual implementation of housing policies in Much Wenlock.

On the limited evidence, related to a single 'preferred' location, the policy cannot be considered legally compliant and sound. The designation of 'preferred site' must be

removed and all sites must be judged against the proposed policies in the SC Local Plan

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Paragraph(s):	2.6 to 2.8 6.8
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The inspectors sumises that the geographical spread of housing for the unmet needs of the Black Country for both housing and employment land should be in the East of the County, this is an unsustainable premise because two of the largest sites at Tasley and IPS form a sandwich of which Much Wenlock, a small rural town with inadequate infrastructure, is the filler. The increase in numbers and increasingly large size of vehicles make the conservation area untenable for tourism and the shopping area unsustainable, simulataiously cutting off the residential parts of the town from the High St.

6.8 Option One is the only sustainable option available to SC No contribution to the B/C Contd on separate sheet

(Please continue on a separate sheet if necessary)

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Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan

Consultation

Addendum to comments Lesley Durbin Much Wenlock Neighbourhood Plan Refresh Group

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Chapters 6 -10 have all been dealt with in the Updated Housing and Employment Paper to which the Much Wenlock Neighbourhood Plan Refresh Group has made their responses clear. Much Wenlock is in serious danger of over development whether for the Black Country Needs or not, with none of the associated improvements in infrastructure planned for the future. Much Wenlock is in the process of Reviewing its Neighbourhood Plan and all indications is the residents, whilst they welcome moderate development in the right place and of the right sort, they do not welcome large scale development on the edge of town away from resources. The forecast for Much Wenlock is a growing elderly population, whilst we must provide for young people's housing needs, we should not ignore the elderly. A single large development is likely to do this because in doing so makes development unviable. Development in Much Wenlock must look to self-sufficiency and sustainability, not putting more traffic on the roads.

11.36. This paragraph states the obvious '*[development] would likely have a negative effect on the conservation and enhancement of landscape character and local distinctiveness, as whilst the extent of any negative impact will be dependent on the location and nature of any extensions to existing proposed allocations/new proposed allocations, any development is still likely to change the character of those places where the majority of people currently live and harm to visual amenity is possible with all forms of development, regardless of location.*' Much Wenlock nestles in a natural landscape bowl close by an area of outstanding natural beauty and any development will adversely affect the visual landscape which residents clearly value in recent local consultations.

National Planning Practice Guidance (NPPG) states that "The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them"

The site [MUW012VAR] is located to the south-west of Much Wenlock. Much Wenlock is located in east Shropshire – an area with a functional relationship to the

Black Country. Much Wenlock is located on the A458 corridor linking to the Black Country. The nearest railway stations to Much Wenlock are located in Telford and Shifnal. This would likely require some other form of transport to access.

Page 781 Appendix 9 page 20 Appendix 9 page 28

Shows that Shropshire Council are actively ignoring all representations from the community

The site assessments for Much Wenlock in Appendix 9 show that all representations to Shropshire Council which do not fit with their pre-ordained plan exercising top down decision making have been consistently ignored.

The main SC driver for allocating a large site in MW in 2019 was certainty of meeting government targets. Meeting govt. targets no longer applies.

There is no scheme of mitigation proposed to offset the acknowledged detriment of an added 1500 houses to meet B/C needs; a proper strategic assessment would set out a strategic response and plan to ensure Sustainability Objectives especially nos. 6 (private car use) and 10 (flood risk) will be met. As such the plan will make matters worse. This may mean little to SC across the county, however, in a sensitive location like Much Wenlock (Rapid Response Catchment, Conservation Area, traffic issues etc), these marginal differences have great weight and impact and need addressing.

1. When it seems convenient to the authors of the consultation papers Much Wenlock is referenced as an area defined by the Much Wenlock Place Plan. When it does not suit the authors of the consultation papers, the site of the former Ironbridge Power Station is regarded as quite separate from Much Wenlock though it lies within the limits of the Much Wenlock Place Plan. As a consequence of this inconsistency housing developments are justified far in excess of local need. This implies, for example, inadequate consideration of the impact of future development on local services. Page 110 Housing and Employment Table 15.1 Proposed Settlement Guidelines and Urban Land Supply
2. The inconsistency of the references to Much Wenlock persist in the production of the different consultation documents. Thus, paragraph 16.130, in section b, on page 137 of the Housing and Employment Topic Paper correctly identifies the following constraint **b. The town catchment has been designated as a highest category Flood Rapid Response Catchment and flood risk is a very significant local consideration, which impacts on the identification of development sites.**

However, in the 'Additional Updated Sustainability Appraisal' consultation paper the designation of Much Wenlock as a Rapid Response Catchment for flood risk in the highest category is not even mentioned. Recognition of the fact that Much Wenlock is the only catchment in Shropshire designated as being within the highest category of flood risk ought to be highlighted throughout all planning documents as a major constraint on all new development.

3. The consultation documents fail throughout to recognise sufficiently clearly that Much Wenlock is not only isolated from any rail connectivity but also suffers from a public transport bus service that is minimal, irregular, often unreliable and frequently inconveniently timed. This ought to be regarded as a major constraint on any significant development, since adding to the current commuting population is unsustainable.
4. There seems to be a repetition of previous arguments that MUW012 is only fair as opposed to other sites being good in sustainability terms (p.249). Is the flood risk assessment correct in Appendix 7? .
5. There is an inconsistency in the repeated statements on each site in Appendix 7, where it says strategically the town is, as a whole unsuitable to take B/C related development until MUW012 where it states the site is large enough to be relevant. This defies logic. This suggests that SC has been and is only interested in finding sites and not planning for the future of the settlement.
6. Appendix 7 states that MW has a functional relationship with the BC but doesn't say what this is. This description is not described in the MW Place Plan and, if anything, MW more relates to Telford.
7. Similarly, SC states that the A458 is a Corridor this description has no status or meaning. The A458 does not actually go to the Black Country it is a road from Bridgnorth to Shrewsbury which passes through Much Wenlock carrying heavy traffic. The SA itself recognises the weak transport connections to Much Wenlock as needing additional consideration; what is SC's plan to address it and how will the functionality be addressed in terms that leads to sustainable development (e.g. reduced private car use into the Black Country)?
8. Then there's the repeated statements about MW needing traffic calming on the A458 when it is only the proposed site development that has prompted this, and that while the site is at risk of flooding (so shouldn't be allocated), the opportunity is for a 'full flood alleviation scheme' which is not described and isn't explained and certainly isn't a catchment based solution.

The residents of Much Wenlock have made their aims and ambitions for the town quite clear within the current Neighbourhood Plan and will it seems continue to do so with the current review process.

