

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:	Michael Grace
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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):	Section2; 8.29; pp43-50; 8.73; table 8.4; 8.87; 16.125-16.139
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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.

Please see attached 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)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

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

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Draft Shropshire Local Plan - Consultation on Key Documents ID28

Additional/separate sheet of comments on:

- [Draft Shropshire Local Plan Updated Additional Sustainability Appraisal Report.pdf](#)
- [Updated Housing and Employment Topic Paper.pdf](#)

Submitted by: Michael Grace [mikegrace57@btinternet.com]

Date: 7th June 2024

The following relates to both the Sustainability Appraisal (SA) and the Housing & Employment papers. These are intricately linked, in particular for their implications for and impact upon Much Wenlock and surrounding area.

The **Sustainability Appraisal** itself seems to fall into two parts, a general comparison of taking either none or 1500 houses for the Black Country and then a revisiting of the site allocations in key settlements to prove to itself that 1500 is the right choice.

On the assessment of accepting 1500:

- The SA acknowledges there will be additional negative impacts (para 6.22) though tries to argue that these will be marginal given the scale of development across the county. This is a weak argument; the logic would therefore be that the Plan can do nothing on any development proposal.
- The SA then suggests that the scale of development can provide opportunities to deliver more benefits (e.g. more 10% biodiversity gain the bigger the sites). This feels absurd as the SA does not then assess the trade-offs between loss of soil/food production and, say, housing provision. The SA simply suggests that the delivery of housing is always the trump card.
- Similarly, there is no scheme of mitigation proposed to offset the acknowledged detriment; a proper strategic assessment should set out a strategic response and plan to ensure that Sustainability Objectives - especially nos. 6 (private car use) and 10 (flood risk) - will be met. As such the plan will make matters worse and is therefore unsound.

In a sensitive location like Much Wenlock (Rapid Response Catchment, Conservation Area, significant and increasing traffic issues, lack of infrastructure etc), these marginal differences have great weight and impact and need addressing.

The **Housing & Employment paper** does not challenge the principle of taking 1500 additional houses despite that since the council drafted the plan there has been a significant easing of having to meet top-down targets. This includes that

Wolverhampton, as one of the twenty largest cities, does not now need to take 20% extra and that the duty to co-operate has been weakened.

This removes a key strategic driver for allocations on the east side of the county. As a result, both the topic paper and the subsequent strategic sustainability appraisal fail to meet national guidance.

In the only public consultation with the community of Much Wenlock in early 2019, Shropshire Council (then strategic planning manager, Adrian Cooper) stated that the key driver for allocating [imposing] a large site in Much Wenlock was to ensure certainty of meeting government targets. This is no longer the case.

The **Housing & Employment** topic paper – echoed in the **Sustainability Appraisal** – contains multiple contradictions and statements that are not supported by evidence. These, in turn, reveal a failure fail to meet national guidance and statutory obligations on the relationship between local plans and neighbourhood development plans (NDP).

Both papers refer to a '*functional relationship*' between Much Wenlock and the Black Country but nowhere is this explained or applied in any detail to justify proposals. Reference is made to being within the 'A458 Corridor', but this does not have any formal status and isn't explained. The Housing & Employment paper then puts the concept to one side in admitting there is no significant strategic relationship between Much Wenlock and the Black Country. Perhaps this is because the A458 does not actually go to the Black Country?

Paras 16.125 – 16.139 of the Housing paper and Appendix 7 of the Sustainability Appraisal both state that Much Wenlock does **not** have a strategic role for meeting housing or employment needs. Yet, Shropshire Council has imposed a large development on the town (site MUW012var). National guidance on the relationship between local and neighbourhood plans is clear that it is for the review of the Much Wenlock NDP to allocate appropriate specific sites in the context of strategic policy. If there is no strategic driver for additional development in Much Wenlock, it should be for the review to determine the scale and location of development in accordance with community aspirations for their town.

The reports both state that there are significant infrastructure weaknesses in terms of public transport and flood risk yet suggests that a large site should be allocated.

The lack of public transport is well known; an hourly service between the town and Shrewsbury/Bridgnorth that ceases to exist in the evenings and none on Sundays/Bank Holidays and a once-a-day service to Telford that does not enable commuting. Despite this, the SA does not propose any mitigation measures for addressing the weaknesses in public transport, including only a vague statement that something will be needed.

This makes the local plan undeliverable as it will lead to an inevitable increase in car commuting and carbon emissions.

Both papers recognise that Much Wenlock is at considerable risk from surface water flooding and flies in the face of national policy by allocating a large site at MUW012var. The proposed site is also the most flood-vulnerable site in the town and even the SA acknowledges that it is not the most sustainable location, rating it only as ‘fair.’ Page 269 of the SA and para 16.130 of the Housing paper strongly suggest the site is allocated to enable a housing scheme that can address the flood risk that otherwise would need investment (e.g. from the large level of government funding available for the Severn Catchment). We can note that the housing numbers were subsequently increased without consultation to make the developer’s proposal commercially sound.

The Sustainability Appraisal and the related Housing & Employment paper are unsound as they fail to meet national policy and will lead to unsustainable development.