

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:	Susan O'Dowd Much Wenlock Civic Society
------------------------	--

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): paragraph f page 31 Table 8.5 page 61 9.10 page 72 Table 9.1 page 74 16.12 page

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.

The assessment of lawfulness and soundness of this document is for professionals with training in the understanding and interpretation of Planning and Development Law. The online only consultation makes it difficult for the lay person to ask questions and seek clarification. This document as with the updated Sustainability Assessments contains some inconsistencies which need clarification. To contribute to the unmet housing need in the Black Country the word 'uplift' of 1500 houses is used. Table 9.1 page 74. Please clarify that development proposed on the former Ironbridge Power Station Site IRN001 including 600 houses for the unmet need in the Black Country will not exceed 1000 dwellings plus a75 home contribution to the extra 500 houses needed in Shropshire. The site will stay within a maximum of 1075 houses until at least the 2038 end of this Local Plan (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)?

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.

B continuation sheet Housing and Employment – Susan O’Dowd – Much Wenlock Civic Society

Paragraph f page 31 “It is considered that the **infrastructure** necessary to support the housing growth associated with Option 3b is **deliverable**, informed by engagement previously undertaken with infrastructure providers during the preparation of the draft Shropshire Local Plan.”

One of the routes identified to the Black Country from the IPS site IRN001 (In the sustainability assessment) is via Much Wenlock along the A4169 and through the highly congested ‘Gaskell Arms’ junction with the A458. Shropshire Council has commissioned a design for improving the junction as part of this former Ironbridge Power Station development in Buildwas, part of the Much Wenlock Place Plan Area. Unfortunately, they are not willing to publish it so that an independent assessment can sought of its potential efficacy now and with increased traffic.

9.10 page 72 the 300 dwellings for the Black Country in Shrewsbury will give rise to, as do the commuters now, greater use of the A458 through Much Wenlock

The Flood Attenuation Scheme (see comments on Sustainability Assessment) which underpins the choice of MuW012VAR is to be delivered by a developer, when flood attenuation is properly a function of the County Council. Much Wenlock is in a Rapid Response Flood Catchment Area in the highest category..

In this document it says the traffic from IPS will access the Black Country by routes including travelling East up the A4169 and taking the M54. As a route to Wolverhampton possibly. Local knowledge and the AA Route finder confirms that the route from Buildwas to Dudley is along the B4176 through Sutton Maddock across the Bridgnorth/Wolverhampton Road and around Wombourne. Its colloquial name of the Rabbit Run may indicate its adequacy or otherwise. This document also identifies Telford and Shifnal as the nearest mainline railway stations to the IPS site and Much Wenlock. This is simply wrong Wellington is the nearest station by about 2 miles on good roads. It has free carparking and the opportunity to find an unoccupied seat before Telford Central. This lack of basic understanding of the infrastructure used in just one Place Plan Area raises the question of the quality and soundness of the assessments in the whole document.

16.127 Much Wenlock Place Plan Area page 107 – Highley is not in the Much Wenlock Place Plan Area.

The Sustainability Assessment document makes no mention of The Rapid Response Flood Catchment Area of Much Wenlock and there is minimal reference in this document. The northern edge of Much Wenlock is a National Landscape but receives little reference in the documents. The Society believes they should both be given more weight along with the poor roads and inadequate footpaths and Much Wenlock be limited as before to development to meet local need.

Much Wenlock is currently undertaking a Review to update its existing Neighbourhood Plan. This has included an up to date Housing Needs Assessment produced by AECOM. The data includes information from the 2021 census.

‘The above estimates suggest that potential need for specialist accommodation could be in the range of 80-96 units over the Neighbourhood Plan period. This would imply almost half of the housing requirement for Much Wenlock should be focused on housing that provides specialist accommodation for older people’. (AECOM HNA for Much Wenlock Neighbourhood Plan Review)

1. AECOM’s modelling exercise suggests that a range of dwelling sizes are needed in Much Wenlock over the plan period. However, the projected demographic changes, occupancy patterns and existing stock suggest most new development should be focused on 2-3 bedroom sized homes. It is relevant to note that the Shropshire SHMA 2020 also anticipated that the largest proportion of homes over the projection period in the SHMA (2016-2038) would be for 3 bedroom properties.

The Preferred Site MuW012VAR is on the southern edge of the town. The building regulations which take disability and the infirmity of old age into account are welcome. However, considering the identified need by AECOM for older peoples’ accommodation a site right on the edge of town well away from the shops, transport, Doctors and other community facilities would not appear sustainable. The very expensive infrastructure required with no guarantee of success. The developers are unlikely to want to build 2 and 3 bed houses for older folk to downsize to on an unsuitable edge of town location.

During the course of producing this draft plan the housing allocation for Much Wenlock has been increased to 200 to allow for the size of MuW012 to become MuW012VAR with 120 houses the developer required in view of the infrastructure required.

In this latest Housing and Employment document the potential brownfield windfall site MuW001 has been given greater prominence to contribute towards the 500 extra houses for Shropshire. This is a site which has been shown to be approved of in the town. It is well placed to provide accommodation for older people downsizing into a more central location. Modern flats in a two and a half-storied sympathetic style would be very likely to produce more than 17 units. There are other possible brownfield sites in the town. The higher figure of 200 dwellings could easily be exceeded. The more roofs and hard parking spaces created the harder it will be to hold back the water in the ever increasing very heavy rainfall events in the town. The Rapid Response Catchment Area designation needs to carry more weight.

Table 8.5 page 61

Much Wenlock	<ul style="list-style-type: none"> • MUW001 is identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 17 dwellings.
--------------	---

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:	Mrs Susan O'Dowd Much Wenlock Civic Society
------------------------	--

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 checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input 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):

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.

Sustainability Topic Paper - Appendix 7 page 28

The Councils stated policy is that development on land prone to flooding should be avoided. It has chosen MuW0012VAR a site that floods regularly as the preferred site. They have gone to some lengths to justify this as they claim that a wide-ranging solution will be provided by the developer for both the development site and existing adjacent sites. Firstly, there is no mention that we can find in this document that Much Wenlock is in a Rapid Response Flood Catchment Area. It is also in the most severe category. This is an unsound assessment (see continuation paper)

(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.

Appendix 7 p28 Continued

Secondly, on three occasions the Society is aware of the planning authority has failed to police the drainage schemes provided by developers. At Hunters Gate flooding after completion of the development lead to an expensive survey by outside engineers. The survey showed the scheme had never been completed satisfactory or not. On Falcon’s Court, again after local flooding, it was found the surface water soakaway had been connected to the combined sewer without permission. A current nearly completed development at Callaughton’s Ash has been suspended. The assertion being that a satisfactory drainage scheme required as a planning condition has never been submitted.

Finally,““Flood and water management measures must not displace water elsewhere.”“

At a very unsatisfactory presentation in Much Wenlock’s Priory Hall, the views of those attending were not asked. The presentation was held by agents for the landowner or the developer it was not clear which. This presentation included the water leaving the site being held back in a pond in parkland on the other side of the Much Wenlock Barrow Road. The parkland is adjacent to Much Wenlock Priory and includes part of a Scheduled Ancient Monument.

The Society lacks confidence in the local authority to supervise the work if only due to lack of resources. Our understanding is that the County Council should be the lead in any major flood attenuation another reason for this being unsound.

Appendix 7 and Appendix 10

Is the A458 through Much Wenlock a Strategic Corridor or not?

Sustainability Paper Appendix 7 page 27

States ‘Much Wenlock is located on the A458 corridor linking to the Black country’

Appendix 10 IRN001 Page 23 Strategic considerations and under Reasoning page24

‘Whilst the site (IRN001) does not directly adjoin the A5 / M54 or A458 strategic corridors it is connected to them by an A road (A4169)’.

It would be helpful if it could be clarified whether or not the A458 which runs through Much Wenlock is or isn’t a strategic corridor. The Society understands that a Strategic Corridor has specific connotations for planning purposes particularly for employment land and would appreciate clarification. The Housing and Employment Topic Paper (Table 15.1) also describes the Former Ironbridge Power Station site on the A4169 as a Strategic Corridor. So is either or both roads a Strategic Corridor.

(See also ‘Table 15.1: ‘Proposed Settlement Guidelines and Urban Land Supply’ in the Housing and Employment topic paper also identifies Much Wenlock and Ironbridge as being on a Strategic Corridor for employment purposes)

The A458 is no longer a trunk road maintained by the Department of Transport.

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:	Susan O'Dowd Much Wenlock Civic Society
------------------------	---

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 checked="" 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 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): 56 page 54 paras 66 and 70

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.

56 The strategy is however likely to reduce the need for residential homes that do not provide high-level care. This role will be increasingly met by the provision of support within the home. Page 54

Shropshire is a county with a low density population. Loneliness is a major problem in old age. Only when the housing where people are supported at home is close and available to facilities where they can join in activities and meet/make friends should the county be considering a serious reduction in residential homes. Cost savings should not come at the detriment to the mental health and wellbeing of older and disabled residents.

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)?

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.

Much Wenlock is carrying out a review in order to update its existing Neighbourhood Plan. AECOM is a specialist company retained by the Government body which supports Neighbourhood Planning. They have carried out a very thorough exercise in assessing the town's housing needs, including information from the 2021 Census.

"The above estimates suggest that potential need for specialist accommodation could be in the range of 80-96 units over the Neighbourhood Plan period. This would imply almost half of the housing requirement for Much Wenlock should be focused on housing that provides specialist accommodation for older people". (AECOM HNA for Much Wenlock Neighbourhood Plan Review)

Some of this could be provided by adapting existing housing. The new requirements for most housing to be adaptable and a percentage to be built to accommodate a wheelchair user is very welcome.

However, despite Much Wenlock having an older demographic than Shropshire as a whole that has aged since the last assessment the Preferred Site for 120 houses promoted by the County Council is at the southern edge of the town. It is at the furthest point from the shops, Post Office, the library, the Doctors surgery, level recreation field, community halls and is not close to the bus stop. See Paragraphs 66 and 70

In Much Wenlock at least the County Council is ignoring its own policy and the expressed wishes at local consultations.

(There is a windfall site `MuW001, the former cattle market, earmarked for 17 homes to contribute to the extra 500 homes for Shropshire which is a more suitable site but if developed to its full extent might take Much Wenlock over the 200 homes target)

Yes, I consider it is necessary/wish to participate in hearing session(s) form B won't save the choice.