

## Draft Shropshire Local Plan – Examination in Public Stage 2

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### MATTER THREE

#### Housing Supply (Matter 3) and Much Wenlock (Matter 19)

In terms of needing large sites (such as MUW 012var), it is worth noting Shropshire Councils comments on the proposed revisions to the NPPF (**Matter 2**)

(<https://newsroom.shropshire.gov.uk/2024/09/housing-targets-questioned-in-draft-response-to-governments-national-planning-policy-framework/> dated 4<sup>th</sup> September). The Council is questioning housing targets in response to Government's potential changes to the NPPF.

This suggests that it considers there is no overriding need in terms of numbers. The Council's proposed response emphasizes the importance of *delivering the right number, type, size, and tenure of housing to meet the needs of local communities*; the need to support economic growth: and that growth levels and locations consider high-quality design and impact on the environment.

Ironically the Council's statement says "Many town and parish councils in Shropshire already have Neighbourhood or Parish Plans or are committed to producing one. The draft NPPF risks superseding such plans, brushing aside the hard work, expertise, and expense that has already been invested". And that "We want to support growth but this can't be done by riding roughshod over local needs and views. We want to ensure that the proposed changes to the NPPF and associated planning system reforms benefit local communities and support sustainable development in the region." Yet, riding roughshod over local needs and views is exactly what the Council have done with this draft local plan in respect of the community's Much Wenlock Neighbourhood Plan (MWNDP) and allocating the most sustainable sites (**Matter 1**).

#### Housing Need, Supply (Matter 3), the implications for Viability of the Local Plan (Matter 5) and viability in Much Wenlock (Matter 19)

The evidence within the *Much Wenlock Housing Needs Assessment* (AECOM Infrastructure & Environment UK Limited. February 2024) demonstrates how the Council's revised SA, Housing paper and site allocations fail to meet the local needs that the Council aspires to deliver. Accordingly it fails to meet the requirements of the NPPF. The HNA estimates potential demand for 10 affordable home ownership dwellings per annum in Much Wenlock. Or some 140 over the plan period. Yet Shropshire's emerging Local Plan policy on this subject (Policy DP3) only requires 20% of all new housing to be affordable. It is relevant to note that the adopted Local Plan policy requires 33% Affordable Housing but this level has been reduced in the emerging Local Plan. Shropshire's current policy therefore works against the delivery of local needs as expected by the NPPF (**Matter 2**) and the current Neighbourhood Plan.

This has implications for the Viability of the Plan and allocated sites. In Much Wenlock, the

Council has rejected more sustainable alternatives for a large site which – because of the need to mitigate its flood risk – is almost certainly prohibitive to develop. It will only deliver 24 affordable dwellings at best. If the needs of the community were to be met, it is almost certain that this allocation would be an unviable choice of sites. The claim of housing and commercial viability is further undermined by the evidence on demographic drivers across Shropshire and Much Wenlock that demand the needs for people with special care and for the elderly are taken into account. The HNA (2024) suggests that potential need for specialist accommodation could be in the range of 80-96 units over the 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.

The revised SA (**Matter 1**) uses the demand/need for housing as overriding justification for its choice of site. The overall numbers of houses proposed for Much Wenlock have not been explained. At the moment the draft plan is simply allocating a convenient (very wet) field being promoted by a commercial developer. The Council has not submitted evidence or given assurances as to how it will resolve the problem of meeting these current and future needs on this site. It cannot rely on sorting this out when a planning application is made.

The conclusion must be that the local plan is not able to deliver viable or sustainable development options which will meet established and evidenced needs, as expected by the NPPF and the Council itself. The response should be a much more sophisticated solution for meeting local needs, working with the community on a range of development options (as required by the NPPF) rather than the imposition of a large site at considerable risk of flooding.

### **Additional Information and Evidence Relevant to Matter 3**

#### **The revised SA and climate change (Matter 1) and Much Wenlock (Matter 19)**

The recent High Court decision on the Cumbrian coal mine Whitehaven coal mine plan quashed by High Court - BBC News (which echoes a similar decision on oil drilling some months previously <https://www.bbc.co.uk/news/articles/cxwwzmn12q9o> ) stated that decisions must take into account of the carbon impacts of the lifetime of the proposals to contribute to decarbonisation and be climate neutral. This heavily emphasises the weight to be given to the most sustainable development locations expected within the NPPF (**Matter 2**). The Council's revised strategic environmental assessment must be reviewed to take into account these legal decisions.

The draft plan should be reconsidered for its overall impact on carbon emissions and climate across the plan period. The SA as it relates to Much Wenlock as a location for development simply doesn't address this issue and does not offer any mitigating proposals for the impact of the development (**Matter 3 and 4**). Indeed, in flood management terms it rejects the solution of nature based solutions which can help mitigate carbon and improve biodiversity.

#### **National Policy (Matter 2) and the current NPPF [the paragraph numbers of the August 2024 version are used here]**

Para 11b of the NPPF sets out a test for authorities to assess adverse impacts of development proposals and whether they outweigh the benefits of the proposal; the revised SA (see **Matter 1**) does not do this, it simply assumes that delivering housing trumps all other considerations.

Paras 29-31 reinforce the existing guidance that it is for Neighbourhood Development Plans to interpret the strategic guidance of the Local Plan and allocate sites appropriate to the needs of that place.

Paras 62-68 requires that needs must be assessed for various groups, provision made for local needs and these should be based on an indicative figure from the local planning authority. This assessment hasn't been undertaken by Shropshire Council for their SA (**Matter 1**) and their allocation for Much Wenlock. This has direct implications for the site allocation and, therefore, more widely the Viability of the Draft Local Plan.

Paras 70-75 gives strong endorsement for small sites to come forward alongside windfall sites. The draft plan ignores small sites even though the revised SA (**Matter 1**) identifies those in Much Wenlock as being more sustainable than the allocated large site (**Matter 3**). The SA therefore fails to meet national policy requirements. Shropshire Council identifies a ridiculously low number of windfall sites; in Much Wenlock the established trend is for some 9 dwellings per year (x14 years, a potential supply of 126 dwellings) which would meet local needs (see Housing Needs Assessment, April 2024; below).

Para 75 requires large sites to have a genuine choice of transport modes; the Draft Local Plan doesn't set out proposals for this choice in places like Much Wenlock. No enhancements have been put forward for public transport options for the settlement as a whole.

Chapter 11 requires the optimisation of the use of land to meet identified needs for housing. This is not the case with the draft plan (**Matter 3**). The Much Wenlock Refresh Group has submitted extensive evidence that makes the case for alternative, better and more sustainable sites for the settlement.

Chapter 12 of the NPPF requires effective engagement with communities. This has been completely absent from Shropshire Council's plan making approach. Evidence submitted for Stage 1 of the EIP demonstrated that Shropshire Council failed to consult in any effective manner and overrode local opinion. It has relied on a confidential meeting with a few members of the (then) Town Council and a so-called public meeting by its development partner.

The NPPF's section (paras 165-170) on Flood Risk is explicit about directing development away from areas at highest risk and sets out the test that development must be necessary and exceptions only if there are wider sustainability benefits. The revised SA (**Matter 1**) does not make that case and, indeed it states that other sites are more sustainable.

### **Employment (Matter 4), the revised SA (Matter 1) and Much Wenlock (Matter 19)**

The Plan should express employment land in terms of the number and the nature of the jobs that will be provided and show how these respond to the economic futures of the places in which they will occur.

There remains a credibility gap in the draft local plan as it doesn't set out how these aspirations will be delivered in places such as Much Wenlock. Despite allocations as key settlements, the Council's economic and infrastructure strategies (see the MW Refresh Group submission for Stage 1) do not extend to all settlements. In Much Wenlock's case, the allocated employment site has been designated for near 20 years and little has been done to discuss the nature of new jobs or to deliver the employment. If the ambition is to balance

employment and housing (**Matter 3**), the Council's plan is set to fail and will, therefore, not deliver sustainable development outcomes expected by the NPPF (**Matter 2**).

The Plan and the SA (**Matter 1**) should address how it will avoid car-borne commuting to Telford and the conurbation and sustain the economic future of the town. If this future is to be based on tourism (historic market town, location on the edge of the Shropshire Hills AONB, the connection with the Olympic Games), then overdevelopment is to be avoided and tourism infrastructure needs to be improved. The draft plan does not do this.

### **Windfalls (Matter 25) and Much Wenlock (Matter 19)**

The *Much Wenlock Housing Needs Assessment* (AECOM Infrastructure & Environment UK Limited. February 2024) sets out that there has been a steady supply of windfall sites of about 9 dwellings a year. The HNA also states that some 6% of dwellings are not occupied; this suggests a latent supply of some 86 dwellings.

This supply can be combined with the known various options for small site development in the town (see the Much Wenlock Refresh Group submissions to Stage 1 and Stage 2).

A different approach to the development 'strategy' of allocating large sites would therefore meet the requirements of Chapter 11 of the NPPF (**Matter 2**) to optimise the use of land and deliver the supply of small sites and accord with the findings of the revised SA (**Matter 1**).

Councils were given new powers in April 2024 (see [New powers for councils to help build more affordable homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-powers-for-councils-to-help-build-more-affordable-homes)) to facilitate site assembly and better development options. This was with the particular purpose "*to help build thousands more social and affordable homes. Councils will be able to buy land for development through the use of Compulsory Purchase Orders without paying inflated 'hope value' costs. 'Hope value' estimates the cost land could be worth if it was developed on in the future, meaning councils are forced to pay potentially thousands more to buy land for housing or developments and get stuck in lengthy disputes about costs. The new legislation will make it cheaper and easier for councils to transform communities by building new homes*".

Shropshire Council states that they can only work with willing landowners. In Much Wenlock there is something of a monopoly landowner (Wenlock Estates, also the owner and promoter of MUW012var) and controls access to some development sites. These new powers could help to release ransom strips which are stopping release of land and the development of more sustainable development options for housing in the town (**Matter 3**).

### **Infrastructure/Viability (Matter 5) and Justification of the Place Plan area (Matter 19)**

Shropshire Council's Place Plan [<https://next.shropshire.gov.uk/place-plans/place-plan-projects-by-area/much-wenlock-and-surrounding-area/>] for Much Wenlock nor the SA (**Matter 1**) does not identify any projects and priorities that relate to resolving flood risk or investment in employment opportunities. All others, except Health improvements, are identified as lower priority. This must assume that resolution of the infrastructure weaknesses will rely on developer contributions. As the dominant source would be the MUW012var, this must further question its viability as a site. If insufficient funds are available, then the development will only make issues worse.

We can note that necessary highway improvements do not include a new roundabout for traffic calming claimed as being necessary for the town by the developer/Shropshire Council.

There is also no reference to the 'functional relationship' between the town and the Black Country, as claimed in the SA (**Matter 1**). This term seems to have been invented to justify some development as a result of the 1500 houses. No evidence has been offered for the nature of the relationship and if this is an adopted policy stance, why is it not in either the Place Plan or the draft Local Plan? It flies in the face of the established local strategy (the role of the MWNDP) (**Matter 2**) of limited development to meet local needs (**Matter 3**) that is responding to significant development pressures due to the town's commuting distance to Telford and the conurbation. Indeed, Shropshire Council consistently ignores the relationship with Telford. .

There is an obvious lack of a substantial connection between the needs of a community, as supposedly identified in the Place Plan, and then the range of potential investment and development options that could help meet them. It brings into question the purpose of the Place Plan. It seems to be used as a reference point for planning policy and potential justification for many things that have not been discussed with the community. If it is a serious document that aims to link places with development needs, it should describe and cost potential projects to ensure that viability issues are understood. What would be delivered through the CIL/IL? In reality it is little more than a list of aspirations that raises expectations and helps to deliver little.

We can also observe an absence in both the Place Plan and the draft local plan of any connection between Cressage and Much Wenlock. The relationship is tenuous except for roads and a limited bus service. How will growth in Cressage impact on or be enabled with Much Wenlock? The risk of additional traffic on narrow lanes and incremental degradation of the areas' rurality is obvious but no highway or alternative transport solutions are offered.

### **Concluding Remarks**

The Draft Local Plan is not sound. **The plan is already dated and now out of date in meeting legal and policy requirements (Matter 2)**. This is especially so in its failure to meet local community needs, the legally established intergenerational need for climate mitigation and carbon reduction over the lifetime of the plan. It chooses not to implement current policy requirements in working with natural flood management processes that deliver well-being and biodiversity benefits. **These should have been included in the revised SA (Matter 1)**.

There is a credibility gap in terms of delivery. The policy proposals and context in the Draft Plan claim a lot and have ambition but then sets out development proposals for particular places which build in failure. Policy ambitions will not be delivered through a reliance on the development of singular large sites. .

The draft plan allocates land without a real and credible appreciation how local needs affect the viability of those sites (**Matter 3**). The plan identifies Much Wenlock as a key settlement but fails to relate development to necessary investment in the place. There is no credible link between development needs and demands, community needs and meeting national objectives through the development process.

This has been compounded by the almost absolute absence of community engagement in the plan preparation. The strategy of the existing Neighbourhood Plan was set aside by Shropshire Council and it held no conversations with the community as to why it took that decision. It has liaised with the landowner for the allocated site but not the community. It

therefore has failed to meet its obligation within the NPPF and its own Statement of Community Involvement.

**I would invite you to find the draft local plan unsound, delete MUW012VAR and to ask Shropshire Council to work with the community of Much Wenlock to review the MWNDP to identify sustainable development options that are appropriate to the place and its needs.**