

## Shropshire Council draft Local Plan : Examination in Public Stage 2

### Matter 19 Much Wenlock Neighbourhood Plan Refresh Group, A0088

#### Site Allocation in Much Wenlock: Basis of local opposition

Much Wenlock Neighbourhood Plan Refresh Group (MWNPRG) is supported by The Much Wenlock Town Council (MWTC) and the Much Wenlock Civic Society (MWCS) in challenging the **scale** of development proposed for the Much Wenlock Place Plan Area (MWPPA) with the town as its centre, as contrary to principles of sustainability, and the **process** by which a single site MUW0012VAR was allocated for housing development by Shropshire Council (SC) in co-operation with a landowner and developer without proper consultation with the community.

Shropshire Council (SC) has claimed that an allocation was made on behalf of the community, in 2018 after consulting the MWTC. The Town Clerk has been unable to trace any record of such a Town Council consultation meeting being called, nor is there any record of a decision being taken to support the allocation of a single proposed housing development site. Both SC and MWTC has been challenged on the matter but neither has been able to provide any record of that consultation.

Site allocations in 2018 ought to have reflected the policies of the Much Wenlock Neighbourhood Plan (MWNP), adopted in 2014 currently under review 2024, and the public responses to that Plan.

#### Much Wenlock Place Plan Area

MW Place Plan (MWPP) p.5 states that key infrastructure issues will emanate from the 1000 (now risen to 1075) development at Ironbridge Power Station (IPS) which lies in the MWPPA. It is our contention that whilst the current target of 200 homes in Much Wenlock by 2038 is achievable it should not be almost wholly allocated to one unsuitable site, and that spreading the load to smaller sites around the town is not only fairer to future local developers but can better alleviate many of the current infrastructure problems.

All allocations ought to respond to local factors including the following -

1. Much Wenlock Catchment was identified in 2015 as the only Rapid Response Flood Catchment in the Highest Category designated in Shropshire. This designation ought to limit the scope and scale of any proposed new development in Much Wenlock as all parts of the catchment are at some risk from flooding. Careful consideration in site identification should, therefore, be given to
  - i. All potential sources of flooding of any allocated site.
  - ii. The extent of any increased flood risk resulting elsewhere
  - iii. The impact of climate change in increasing future flood risk.

MWPP, p.8, acknowledges flood risks on Hunters Gate (adjacent to the proposed MUW012VAR) and additional difficulties associated with the wastewater and sewage network capacity, none of which is currently costed for improvement or given Priority A status.

2. The priorities locally identified through the 2014 Neighbourhood Plan and a further five recent public consultations in connection with a 2024 Review of the MWNP are:
  - a. social housing for rent and shared equity
  - b. homes designed to meet the needs of the elderly and/or those with disabilities
  - c. the community preference for sites not exceeding 25 dwellings, or at most 50.

These priorities embody a preference for housing within easy walking distance of local services.

3. The principles embodied in Government Planning Guidance should also have been employed in determining the location of any land designated for development. Thus –
  - a. A primary aim should be the sustainability of the community.
  - b. Priority in site allocation should be given to brownfield sites.
  - c. The best quality agricultural land should not be allocated for development.
  - d. Land liable to flooding from any source should be regarded as unsuitable for any priority designation for development.
  - e. When suitable sites are being determined, those least at risk of flooding should always be given priority over those known to be liable to be flooded.

**The evidence of increased flooding and increased flood risk, as well as the projected major growth in Buildwas has strengthened community opposition to any large development in Much Wenlock.**

### **Assessment of the site allocation currently proposed by Shropshire Council - MUW012VAR**

The site MW012VAR has been allocated 'preferred site' status by SC,

- is among those considered most liable to flooding
- the proposal is for at least 120 dwellings
- is the largest development ever proposed in the town.
- not close to town services, including secondary education and healthcare.
- is identified as the highest quality agricultural land locally.
- the proposal that the well-known flooding problems of this site ought to be resolved by agreement with the developer is unacceptable to nearby residents.
- The cost of such an approach could seriously compromise delivery of the identified priority of affordable housing.

Nowhere in the Much Wenlock Place Plan are any of the above issues connected with MUW012VAR and the town of Much Wenlock given Priority A status or costed in a definitive manner. All of the identified Place Plan projects are allocated with Priority B status (excepting additional educational facilities at secondary level associated with the IPS development.) All of the infrastructure improvements associated with IPS are defined within Buildwas with none for Much Wenlock.

Alongside the principles in National Planning Guidance there are several elements of practical local relevance to be considered. They include –

- Difficulty in ensuring that designated employment land provides for local employment, creating an unsustainable dormitory community.
- The recently repeated experience of serious local groundwater flooding.
- The 2023 experience of dramatic flash flooding which by-passed SUDS provision.
- The present inadequacy of the local infrastructure as exemplified by –
  - Limited sewage treatment and surface water disposal capacity
  - Regular experience of low water pressure (recent searches could not find evidence of any spending plans for Much Wenlock by Severn Trent Water Co.)
  - Limited capacity at the local medical surgery
  - Excessive through traffic (causing air pollution, noise pollution, traffic queues, rat-running, dangers to pedestrians)

## Poor public transport

These serious infrastructure limitations bring into question whether the overall designation of Much Wenlock as a Key Centre can be justified. [Appendix 5 Residential Development guidelines and Residential Supply. P345 SCLP] The proposal to build over 1000 new homes within the area of the MWPPA, in Buildwas Parish, makes these issues more acute.

Much Wenlock is noted in the Core Strategy as only being suited to *'limited development that reflects its important service and employment centre role whilst retaining its historic character'*. This Core Strategy also states that *'The town is subject to inward development pressure and to avoid becoming a commuting settlement, the priority is for local employment opportunities balanced with housing and infrastructure to meet local needs.* [p 58 Core Strategy]. The concept that Much Wenlock should be regarded as standing on a 'strategic transport corridor' does not appear in the Core Strategy and has never been subject to critical examination or public consultation. The MWPPA Chp 2.2, Pages 19-20, reiterates all of the above including describing the A458 as a key transport route NOT a strategic corridor, of which there is no such thing in the Core Strategy. The Proposed Local Plan for Much Wenlock ignores all aspects of its own Place Plan and the MW Neighbourhood Plan

**Summary: The Much Wenlock Town Council, Civic Society and Refresh Group believe that the scale of development proposed for the town is excessive. They also object to the process by which a single large housing development site has been proposed in a location liable to serious flooding and a poor sustainability profile.**

## **A detailed analysis of the background to the objections identified above.**

### **Shropshire Council's Strategic Infrastructure Plan**

There is no mention of 'strategic corridors' in The Shropshire Economic Growth Strategy 2022. The appendix to Strategic Locations (p.12) states the aim *"To be active in identifying and delivering opportunities for targeted investment locations and a "place-based" approach within the market towns. Putting people's needs at the heart of housing, infrastructure, employment and local service provision to create sustainable, prosperous, growing communities."* In the table, under 'potential intervention' it mentions the *"Appropriate supply of service and employment land; Growth corridors focus - A5, A49, A483, M54."* The A458 and A4169, were not included, neither was Much Wenlock.

Our letter to Shropshire Council's Leader, Cllr Lezley Picton dated 27 July 2023 highlighted this focus on 'growth corridors'.

*'There is no mention in the Much Wenlock and Surrounding Area Place Plan of Much Wenlock being a suitable town to sit along a strategic corridor and, like the Strategic Infrastructure Implementation Plan, there is absolutely no provision whatsoever for the highway infrastructure to be provided to accommodate further development along the proposed corridor'.*

The response from the SC policy team dated 21 08 2023 read;

*"With regards the content and application of the Strategic Corridors policy, having discussed with the Planning Policy team, it is necessary for me to point out some clarifications to your analysis. The key purpose of this policy is to support the potential for major employment development for the benefit of the Shropshire economy. Within this context it is appropriate for the policy to recognise the location of the strategic corridors, including the Eastern Belt*

*(M54/A5, A41/A464 and A4169/A458/A454), although I must point out this is just a recognition of existing routes, both road and rail, rather than being a formal designation.'*

Our question remains: Is policy SP14 a policy or not?, If it is not, then the A4169 and the A458 ought not to be included as elements in strategic corridors.

### **Shropshire Council (SC) Site Assessments 2020 Much Wenlock (MW)**

Attached to this statement is Much Wenlock Place Plan (MWPP)

Appendix N Much Wenlock Place Plan Area Site Assessments Published: Dec 2020, part of Shropshire Council Local Plan Review

The attachment, Appendix N (2020) includes our comments, highlighted in red on each site including comparisons with Much Wenlock Place Plan Area Site Assessments published November 2018.

Close reading of this appended table highlights a number of issues,

- There are inconsistencies in the assessments,: some sites take the impact on the Gaskell junction into account whilst others do not.
- Assessments in Stage 2a, Sites 2-9 all have a Good grading, whilst MUW012VAR, the SC preferred site' is graded as – 4 Fair.
- MUW008 continues to be assessed as at flood risk although successful flood alleviation measures have now been put in place which protect this site.
- MUW012 is noted as being' not in accordance' with MWNP whereas MUW012VAR, in effect the same site, is not recorded as being 'not in accordance'. The change in assessment is not explained.
- MUW012 and MUW012VAR are two pieces of land which when joined make a much larger allocation for the preferred site than the notional 120 dwellings which, according to the developer, would finance the required flood alleviation. This 2020 site assessment allows for a preferred site of 290 dwellings.
- None of the sites allocated for assessments has been put to the community by referendum as encouraged by Govt guidance on Neighbourhood Planning. This should have been a requirement because MUW012VAR significantly changes the development boundary set out by both Shropshire Council and the Much Wenlock Neighbourhood Plan. Therefore, SC should have consulted with the community before committing to the preferred site in January 2019.
- MUW013, Stretton Road and MUW011 designated employment land is clearly inadequate provision for local employment commensurate with proposed housing growth.

### **Certainty through small scale development**

The Shropshire Council Local Plan Review set out an expectation that Much Wenlock will deliver 150 houses between 2016 and 2036. In doing so, it initially allocated a 'preferred site' of 80 dwellings (known as MUW012) on land adjacent to the primary school at Bridgnorth Road. This site allocation has now been extended (at the behest of the developer) and renamed MUW012VAR and the allocation of homes increased to 120 by 2038.

The 120 houses on one site would detract from the historic nature of the town and its sense of community.

The overall increase in dwellings for Much Wenlock has also been raised from 150 houses to 200 by 2038.

Importantly, as explained below, delivery can continue to adhere to the policies set out within the Much Wenlock Neighbourhood Plan, i.e. to deliver housing suited to local needs within the scale and size of the town.

**Our evidence for deliverability is as follows:**

Between March 2013 (the starting point of the MWNP) and March 2017, SC Completions and Supply (available on request) report showed MW had provided 73 homes of the total 130 required. That is 18.25 homes per year.

On 3rd January 2019 SC established that the MWNP must be aligned to the beginning and end dates of their Core Strategy and Local Plan. The new dates for establishing completions were 2016 -2036. The requirements for new dwellings in Much Wenlock were given as;

Preferred number of dwellings guideline 2016-2036	150
Dwelling completed 2016-18	31
Dwellings committed at 1 April 2018	24
Remaining dwelling requirement to be identified	95

This new date span represents an average of between 5 and 6 dwellings per year required to fulfil the SC Housing preferred number of dwellings under guidelines for Much Wenlock until 2036.

The preferred number of dwelling guidelines for MW have been changed yet again.

They are now;

2016 -2038 200 dwellings. We were also told that between, 2016 and Jan 2021 41 completed dwellings were recorded.

These latest figures require MW to find 159 homes between 2021 -2038, an average of less than 10 houses per year.

Shropshire Council's own figures show completions between 2013 -2017 (blue) of over 18 dwellings per year.

SC's figures (purple) show that over a two to three-year time span (spanning 2016-18), 55 new dwellings have either been completed or committed.

By both measures (blue and purple), Much Wenlock has consistently exceeded targets using only small scale infill, small size developments and exceptions sites in and around the town.

The risk is that over development is likely to continue (green). This represents a significant potential to defeat the wider strategic and local policy for the town of 'limited development to meet local needs'.

The proximity of Telford, where incentives and infrastructure are readily available, means that employment land in Much Wenlock has not been developed to include, water supply, drainage, sewage, three phase electricity etc. It remains a chimera. The public transport system is in a parlous state.

There is an undeniable risk of creating an increasingly unsustainable dormitory community. Much Wenlock has neither usable employment land nor access to a useful and reliable public transport system. All of which is acknowledged in the MWPP Further developments at Callaughton Ash, (14), 'preferred' large scale development at MUW012 VAR (120) plus 1070 homes as part of IPS, and at least 76 additional homes given permission or occupied in quarries at Presthoke and Shadwell, all lying within MWPPA with residents having full entitlement on already overstretched educational, social, medical, water and sewage infrastructure, none of which is alleviated within the MWPP priorities. The development targets set for Much Wenlock by SC will inevitably be exceeded by a significant number.

The calculations on which Shropshire Council has based its frequently changing demands for development in Much Wenlock remain obscure. There are inconsistencies between the Place Plan and the Local Plan in terms of the demands on Much Wenlock. Moreover, it is far from clear that due attention has ever been given to the adopted Neighbourhood Plan or the repeated requests to the Local Plan Policy Officer for explanations.

Sadly the SC green infrastructure strategy for Much Wenlock indicates that the much needed improvements of Open Space can only be achieved by a single allocated large development.

We continue to stress that it must be for the wider community to decide how the development needs of the town should be met.

Several options remain for development within the current development boundaries including some potential brownfield sites where a change in use can be anticipated. These include -

- MUW001 Morris Corfield (17units),
- MUW002 Travis Perkins (11),. this allocation can be doubled to 22 with single level or 33, retirement dwellings in maisonette form without sight line interruption.
- MUW008 Sytche Lane (334) reduce this allocation to 80 homes.
- potential employment site MUW011 Church Stretton Rd (now reduced in size with an attenuation pond over much of its area).

These residential and employment sites, in combination, offer a more flexible opportunity than Shropshire Council's current preferred site proposal at MUW012VAR. The community has been consulted as part of the Neighbourhood Plan Review process to establish their preferred options for development, the result is that the majority of those consulted want smaller development sites nearer the town.

The delivery of 26 affordable dwelling at Callaughton Ash, an exception site, shows that the community and Town Council can deliver affordable homes for local people by working directly with Housing Providers rather than relying on the delivery of affordable homes as a, potentially very small, percentage of a single market development.

In combination our suggested alternative sites would provide not only market development but include, in the process;

- one and two bedroom new homes to buy or social rent

- single level retirement living

All would have the following advantages: being ,

- closer to the amenities in the town enabling easier walking and cycle journeys
- reducing unnecessary car journeys, congestion and the demand for parking
- reduced air pollution and helping to achieve Net Zero Carbon as declared by UK Government and SC's Climate Emergency
- relieving the imminent pressure on the highway network, especially the Gaskell junction
- designed to reduce surface water flooding risk across the town
- providing affordable housing contributions
- adding to a CIL pot to help deliver some of the numerous uncosted projects identified in the Place Plan

We suggest that a site assessment plan which will fall within the policies set out in the MWNP and suit the needs of the town can be achieved.

**We believe that our analysis shows that SC has not given sufficient time and effort to thoroughly examine the alternative options for development and has certainly not consulted widely with the community as required by the Neighbourhood Plan.**