

## Draft Shropshire Local Plan, Examination in Public Part 2. (Matter 19)

### Submission by Howard Horsley

#### Reference Numbers: A0231 and B-A006

This public examination has been protracted, with certain issues dominating its agenda. Among the issues that, perhaps, deserve greater attention is future development in the Much Wenlock Place Plan area. National housing targets and local needs are both being met through a strategic development within Buildwas Parish. Elsewhere in the Place Plan area an additional “preferred site” is also proposed in a demonstrably unsuitable location, within a Rapid Response Catchment. As the Planning Inspectorate faces a huge volume of documentation, I will make my submission as brief and clear as possible.

1.

In principle, I support submissions being made by the Refresh Group and the Much Wenlock Civic Society. The sole issue on which I am adding to those submissions is that of the seriousness of the flood risk in the Much Wenlock catchment, with specific regard to the Draft Local Plan designated ‘preferred site’. That risk is observably continuing to increase, as a consequence of the local nature of the impact of climate change.

2.

My objection to endorsement of this preferred site by this inquiry is based on professional expertise, combined with significant field observation in all weathers. After participating in a major research project of the International Hydrological Decade, I have a good grasp of the vital importance of sustained field observation. As a geography graduate, I understand the topography, geology and hydrology of the Much Wenlock Catchment. My appraisal is entirely consistent with Environment Agency designation of the catchment as a Rapid Response Catchment, presenting the highest category of flood risk.

3.

This category of risk, designated by the Environment Agency, identifies through scientific analysis, a very small number of catchments at risk of a “Boscastle” type flood. The local risk is very real. During a 24 hour period in the weekend of the 7<sup>th</sup>/8<sup>th</sup> September 2024 RAF Shawbury recorded the highest rainfall anywhere in the UK. The intense feature causing this rainfall did not extend across Shropshire as far as Much Wenlock. In the relatively flat area around Shawbury, the flood caused significant damage. Had such a storm been concentrated over Much Wenlock’s hills the results might have been catastrophic.

4.

The ‘preferred site’ is more prone to flooding than any other site on the Much Wenlock development boundary. The Environment Agency and ‘SciMap’ confirm this to be the case. Designation as the preferred site is not consistent with national planning guidance. In any

event, local housing completion targets are being achieved without identifying any preferred site. The increased number of homes proposed on the 'preferred site' increases overall flash flood risk, rather than reducing it. No evidence has been presented of a reappraisal of flood risk following the projected increase in the number of dwellings.

5.

My professional assessment of local flood risk, including the preferred site, has been openly presented to the Environment Agency, to Severn Trent Water and to the Shropshire Council, who have not chosen to challenge my appraisal. That appraisal has since been validated by a dramatic, publicly available, video clip of the extent of the most recent site flood and the visible breadth of origin of the flood water. The continued 'preferred site' designation is, I contend, at best, a gamble. Any proposed developer must demonstrate financial resources, long-term commitment, expertise, and probity to eliminate serious, and increasing, flood risk on the site and elsewhere in the catchment as a whole. Recent local experience of developer conduct over managing flood risk has not been reassuring.

6.

The Planning Inspectorate regulates the planning system, charged among other things, with denying approval for any site designation increasing risks to lives, livelihoods homes, and businesses. Developers legitimately risk investors funds to promote developments. The Planning Inspectorate risks both its reputation and the credibility of the planning system if it approves a site designation leading later to disastrous consequences.

7.

Refusal to endorse the designation of MUW012VAR as the 'preferred site' eliminates risk to the reputation of the Inspectorate and to the credibility of the planning system. My involvement in planning has been sufficiently broad for me to note that refusal to endorse a preferred site may not prevent a developer from pressing their case. The Inspectorate is simply being asked to examine abundant evidence about the site and its setting and to reject preferred site designation, as an "**unsound**" element in the Draft Local Plan.

8.

I urge the Inspectorate to act prudently, ensuring that the name of Much Wenlock is not in future associated with poor decision making or with alarming planning outcomes.

Howard Horsley

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